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ABSTRACT

The California Department of Education awarded Amnesty Education Program funds to service providers to serve immigrant adults needing to fulfill legalization requirements by obtaining a Certificate of Satisfactory Pursuit, and to make available to immigrant adults education and training that would enable them to succeed in school and become more employable. An evaluation was directed toward determining the most and least effective aspects of the Amnesty Education Program, the range and intensity of services needed by participants, the effects of the program administration on the delivery of services, and the differences in type and quality of services provided by local service agencies. Data for the evaluation were gathered through a review of the literature pertaining to immigrants and immigrant service programs and interviews with key constituencies involved with the program, health officers counties heavily affected, legislative staff, and administrators of amnesty programs in four other states. The study found that in the hurry to institute the program and the lack of federal responsibility for this federal initiative, many difficulties were caused. For example, amnesty education operated without regulations for more than a year. Lack of planning set the stage for something less than a model system, although local programs were often able to provide good programs individually. Educational administrators and program providers involved in the program felt that given the lack of direction, the intense demand, and the time constraints of the amnesty program, it is amazing that it accomplished as much as it did. Extensive recommendations were made in the following areas: federal program planning, oversight, and administration; state program planning and coordination; and Amnesty Education Program coordination. (Appendices describe key constituencies interviewed, list members of the statewide advisory committee, and contain eight references.) (KC)

ED 377 367

An Evaluation of the California Amnesty Education Program:

Issues and Perspectives

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June 1994

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The conclusions and perspectives expressed in this evaluation are the responsibility of the authors and do not necessarily reflect the views of the California Department of Education or staff of the Amnesty Education Program.

I. Introduction

This evaluation has two purposes. First, it summarize constituents' opinions on the characteristics, benefits and liabilities of California's Amnesty Education Program. Second, and just as important to the authors, this evaluation is directed toward *informed decision making* about future immigrant education programs in California. To this end, this evaluation became critical in its perspective, at times quite critical.

It provides findings and recommendations concerning the viability of future immigrant education programs based on 1) productive aspects of the Amnesty Education Program experience in California, 2) deficiencies in California's implementation of the Amnesty Education Program, 3) comparisons with programs in four other states with major amnesty populations, and 4) perspectives of key constituencies associated with California's Amnesty Education Program. In short, this evaluation is oriented toward the future: how can California's new immigrants be best served by current and future education service systems?

The California State Education Plan for State Legalization Impact Assistance Grants (SLIAG), Immigration Reform and Control Act of 1986, PL 99-603 — in defining its summary of adult program requirements — specifies that the Department of Education "will prepare a program evaluation report and submit it to the Secretary of the Health and Welfare Agency." This evaluation was conducted, in part, to fulfill this requirement.

Over and above this federal requirement, the evaluation provides a unique opportunity to critically examine the Amnesty Education Program in California. Since only one statewide evaluation report on amnesty education has been produced (New York State's is the only comprehensive evaluation available), this report can be especially important to federal and state policymakers serving immigrant populations. The goal of this report is to serve legislators, social service providers, and educators currently attempting to prepare the "new Californians" for citizenship, further schooling and full entry into the workforce.

The structure of this report is meant to assist readers in two ways. First, the three major portions of the "Issues" section are in the order they occurred: federal planning, state planning and state implementation. This order sets the stage for the central portion of the report, California's implementation of the Amnesty Education Program, by introducing issues early in the federal planning section, then reiterating and "fleshing-out" these issues through the next two

sections. Second, the report's structure demonstrates how the characteristics of federal planning set the stage for state planning, and together, guided the implementation of the program. This order, we believe, carries the reader along, hinting at issues in earlier sections that will be more thoroughly described as the report progresses. The authors believe this approach, while demanding patience by the reader, gives the most accurate rendering of just how the Amnesty Education Program unfolded in California.

Finally, several prior reports were issued describing the needs and experiences of immigrant populations. While these reports — for example, *Caught in the Shadows* (1992), *Immigrant Voices* (1991) and *Reaching Out* (1992) — tend to support and reinforce some of the findings and recommendations of this evaluation, they do not provide any systematic description of the structural aspects of the Amnesty Education Program or explanation of how and why it operated as it did. For this reason, the evaluators were oriented to identify those structural features which most enabled as well as hampered the effectiveness of the Amnesty Education Program, and to offer insights into how best to provide education services to immigrant adults.

A. Background

The Immigration Reform and Control Act of 1986 (IRCA) was intended as a once-in-a-lifetime opportunity for undocumented long-time residents of the United States to establish legal residency. IRCA was directed toward immigrants who had been "living in the shadows," undocumented immigrants living continuously in the U.S. since January 1, 1982. The Act provided the opportunity for undocumented immigrants to attain legal status, hence the right to remain, work and begin their journeys toward citizenship in the U.S. This opportunity was also extended to Special Agricultural Workers (SAWs) who had worked in agricultural jobs at least 90 days between May 1985 and May 1986.

Recognizing its responsibility to assist states serving this newly "legal" population, IRCA contained a provision for reimbursing states: the State Legalization Impact Assistance Grants (SLIAG) program. These grants, made to a single administrative agency within each state, were intended to reduce states' fiscal responsibilities for providing qualified immigrants with public health services, education services and public assistance. This grant program was especially important to California given that, since 1980, California has absorbed over 40 percent of new (legal) immigration into the

U.S.[1] This represents a greater percentage than the total of the four states with the next largest legal immigrant populations[2]. Not surprisingly, of the $4 billion in SLIAG funds allocated by Congress to the states for immigrant health, education and public assistance, $1.72 billion (43 percent) went to California, with $413 million of that being spent on education under the Amnesty Education Program.

Even though the prevalence of immigrants in California has been fairly well understood by California's leaders for some time, still the magnitude of immigrants' participation in IRCA has been overwhelming. Based on Comprehensive Adult Student Assessment System (CASAS) data[3], since January 1, 1986, **1.6 million** immigrants were eligible for legalization in California. Most came from Mexico (78-93 percent by various estimates). During 1991, for example, most newly legalized immigrants in California came from Mexico (69 percent), with other substantial populations issuing from the Philippines (4 percent), El Salvador (3 percent), Vietnam (3 percent), and China 2 percent)[4]. Immigrants included people of all ages, with the largest percentages represented by those aged 18-24 (41 percent), followed by 24-44 (30 percent) and those under 18 26 percent). While most of these immigrants were males (62 percent), over half were married (56 percent)[5]. Immigrant families have and will continue to have an impact of California's public policy and life. For instance, 53

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[1] Best information suggests that 40 percent is a conservative estimate of California's share of the *total* immigrant migration into the U.S. over the last ten years. For instance, both California's Department of Finance's Population Research Unit and the U.S. Census Bureau estimate California is currently the residency for more than half of all undocumented persons in the United States and nearly half of all legal refugees: an estimated 1.3 million illegal immigrants and 600,000 refugees.

[2] For comparison, the four states are Texas (12 percent), New York (10 percent), Florida (8 percent) and Illinois (4 percent) of the total legal immigration into the U.S.

[3] "A Survey of Newly Legalized Persons in California," (CASAS, 1989).

[4] Various estimates of immigrants from Mexico who were eligible for legalization in California ranged from 82-93 percent (CASAS survey) to 78-91 percent (INS data). The 69 percent figure for 1991 newly legalized immigrants from Mexico under-represents the Latino prevalence, since 19 percent of the total immigrant population was classified as "Other", and overwhelmingly included Latino populations of non-Mexican origins.

[5] The high percentage of married immigrants has been (and remains) especially important to California because of the recently passed Immigration Act of 1990, which emphasizes family-sponsored immigration.

percent of amnesty applicants reported having families of one to three children per household, while 16 percent reported having four or more children, and 97 percent are of child-bearing age.

Providing even minimal education services to this population represented a formidable task since immigrant adults' average years education in their native country was only 5.6 years of schooling. Sixty-five percent of the amnesty education population had fewer than six years of education, and more than one-third were not literate in their native language.

Given the diversity of immigrants' educational needs, the Amnesty Education Program included 256 agencies representing three types of service providers: adult schools, community-based organizations, and community colleges. Over the life of California's Amnesty Education Program — 1987-1992 — the largest percentage of immigrant enrollment was handled by adult schools (61 percent), followed more distantly by community-based organizations 26 percent) and, finally, by community colleges (13 percent)[6].

B. Major Questions for the Evaluation

The California Department of Education[7] (CDE) awarded Amnesty Education Program funds to service providers based on their ability to meet two goals:

1) To serve immigrant adults needing to fulfill legalization requirements by obtaining a *Certificate of Satisfactory Pursuit*[8], and

2) To make available education and training that would enable immigrant adults to pursue and succeed in school, become more employable, and otherwise realize their fuller potential as citizens of the U.S.

Although clear documentation exists that the first goal was accomplished by thousands of immigrants, this evaluation was stimulated by insufficient understanding of the extent to which the second goal

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[6] "A Survey of Newly Legalized Persons in California" (CASAS, 1989).

[7] The California Department of Education received its SLIAG amnesty education reimbursement of costs from federal funds administered by California's Health and Welfare Agency (HWA).

[8] This certificate indicating at least 40 hours of instruction represented the only outcome sanctioned by the Amnesty Education Program.

was accomplished. Generally speaking, this evaluation was directed toward answering the following four questions:

- What were the most and least effective aspects of the Amnesty Education Program?
- What were the range and intensity of services needed by participants?
- How was the delivery of services to participants affected by the administration of the Amnesty Education Program?
- What differences existed in type and quality of services provided by local service agencies?

To answer these questions, the evaluators relied heavily on interviews conducted with state administrators as well as administrators of local service agencies — adult schools, community-based organizations, and community colleges — as well as instructors and students[9]. The evaluation attempted to provide informed insights and recommendations from both "top" and "grassroots" levels on practical ways that California's service providers could best meet immigrant adults' education and training needs at reasonable costs, given that the demand for such services likely will continue.

Please note that the evaluation did not answer the following "bottom line" question: to what extent did program participation lead to positive outcomes for participants, such as subsequent school attendance, increased employability and increased participation in the civic life of their communities? At best, the evaluation *was* able to collect anecdotal information on the extent to which the program encouraged immigrants to continue their education. To provide an adequate answer to this entire question would require an evaluation that was developed as an integral part of the program. Such an evaluation would include long-term tracking of representative individual immigrants from their initial amnesty education experiences through their continuing education or vocational training experiences and, finally, to their employment experiences. For even greater confidence in the evaluation's findings, such an evaluation

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[9] The reliance on interviews was determined by two factors: the almost complete absence of follow-up tracking of participants; and the lack of comprehensive data on client characteristics, client dispositions, service innovations, service quality, impact of providers through their association with the Amnesty Education Program, etc.

likely would include cohort tracking: the use of a comparison group of immigrants who did not take advantage of the education program. Clearly, such protocol would involve a considerable investment of time, effort and money.

C. Methodology

Data gathering for the evaluation was conducted from October 1992 through December 1993, and consisted of a review of the literature pertaining to immigrants and immigrant service programs; interviews with key constituencies involved with the program; interviews with the health officers of California counties which contain major immigrant populations; interviews with legislative staff, together with a review of related legislation and literature pertaining to immigrants and immigrant service programs; and interviews with administrators of amnesty programs in the four other states with substantial SLIAG programs.

Literature Review

While planning the evaluation, it was decided that a literature review would be conducted to gather information on immigrant education issues in California, and to assess this information to define possible refinements of practices and programs. The literature review provided valuable material on a range of immigrant issues[10] that supplemented interview data. When, in the course of the evaluation, it became apparent that the implications of the program would likely extend beyond the original scope of SLIAG, the literature search was broadened to cover a range of topics and issues addressing policies, problems and impacts surrounding immigrants and immigration in California and the U.S. in general. This additional information shed light on practices and policies that could assist in successfully serving immigrants' needs including integrating them into the American social, economic and political environment.

The literature search utilized NEXIS-LEXIS, ERIC, EUREKA, UMI and LEGITECH databases. Citations of books, journals, government publications, reports, magazines, conferences and seminars, newspaper articles, bibliographies, dissertations, reference works, public

[10] Unfortunately, the literature concluded that with the exception of New York State's evaluation of its amnesty program, there had been no wide-ranging examination of any program in terms of its processes, outcomes or impact on clients and service providers. This fact underscored the need for California's evaluation of its Amnesty Education Program.

documents and legislation were examined. Any information that would clarify or highlight trends and implications affecting either immigrant populations, service providers or state agencies was noted.

Interviews with Key Constituencies

The evaluation included interviews with six key constituencies: representatives of the Statewide Advisory Committee; Federal Department of Health and Human Services representatives; California State administrators, including Health and Welfare Agency and California Department of Education (CDE) representatives; local service provider representatives, instructors, and students who graduated from the Amnesty Education Program; representatives from selected California county health departments; and representatives from four other states' programs. Characteristics of each component of the evaluation are in Appendix A.

II. Issues

The three primary issues of California's Amnesty Education Program are: federal planning, oversight and administration; statewide program pre-planning and strategic planning; and program oversight and refinement by CDE and the State Advisory Committee. These issues are presented in the order that mirrors the genesis of the program, with federal planning issues preceding state planning issues, and state planning issues preceding state oversight and implementation issues.

A. Federal Planning, Oversight and Administration

Context of the Issue

By the early 1980s, the issue of immigration was rapidly expanding beyond the simple question of the extent to which the U.S. had an effective immigration policy. Increasingly, the question of federal immigration policies and practices was being transformed by states into the issue of federal responsibility. In short, states such as California, Florida, Illinois, New York and Texas began to voice dissatisfaction because the government's primary service to them was through the Immigration and Naturalization Service (INS) — the traditional federal agency. Rather, states became increasingly adamant that the federal government recognize the effects of its immigrant policies and practices on the economic and public service dimensions of state and local governments. In California, with millions of immigrants, the consequences of federal policies and practices were being felt across and throughout its public service systems: education, health and medical care, economic assistance, transportation and public safety. Coupled with declining economic indicators for California as a whole, the increasing demand on public systems set the stage for redress of costs borne by states through federal reimbursement programs.

In light of states' concerns and as a recognition of its responsibility, Congress developed and passed the Immigration Reform and Control Act (IRCA). A portion of this founded SLIAG which, in turn, reimbursed states for costs associated with providing services to a special class of recent immigrants. SLIAG was not intended to cover all costs of providing services to the new class of legalized aliens, but only to assist in meeting states' costs of services provided to eligible immigrants. According to the SLIAG regulations, the purpose of the program was "to alleviate the financial impact of state and local governments that may result from the adjustment of immigration status under IRCA of certain groups of aliens..." (454CFR, part 402). The states, in turn, were to use the funds to provide services in public health, public assistance and education services.

Clearly, SLIAG was always intended as a limited term, limited-scope strategy for ameliorating the impact of high levels of immigration experienced by several states. The enabling legislation, just as clearly, did not provide for any continuation or future transition of, for instance, the Amnesty Education Program component of SLIAG, into any other federal assistance or reimbursement program. States were given, by statute and *de facto*, wide latitude in how they allocated funds within their jurisdictions. By statute, states had flexibility with precisely how to allocate and deliver services. In fact, because federal administrators were not fully prepared to deliver regulations and implement the program in a systematic fashion, states had (or suffered) even greater flexibility. As will be presented in this report, this flexibility was a mixed blessing, even for those states, unlike California, which had implemented full-service systems or at least empirically-based plans for delivering SLIAG-related services.

Critical Issues

Given the orientation of this evaluation, following are the primary difficulties related to the lack of timely and effective federal planning, oversight and administration:

- SLIAG's mission,
- technical assistance by the federal government,
- year-to-year budget allocations,
- stakeholders' participation in the refinement of federal perspectives, and
- program evaluation.

SLIAG's Mission

With both this lack of technical assistance and any reaffirmation of the goals of SLIAG, difficulties evolved. Without federal guidance (or at least assistance) there arose varying, seriously-held, often-contradictory positions regarding the overall mission of SLIAG. These differences in perceived mission included:

1) Allegations that the INS was aiming at the practical exclusion of aliens;

2) Complaints that community-based organizations (CBOs), in particular, were solely interested in registering new voters who could carry the political agenda of immigrants;

3) Advocacy that amnesty education must include a truly educational perspective, i.e. the introduction of new populations to educational institutions and learning paths; and

4) Directed support for the introduction of new populations into the workforce and new career opportunities, to become a productive part of California's economy.

This lack of concurrence — or at least difference in fundamental outlook — was not productive. For example, CDE was not interested in providing education classes whose sole mission was to promote citizenship. Rather, their orientation was to develop adequate literacy, present educational "study path" opportunities, develop work skills and provide a successful transition into the general work force, in addition to citizenship education. Consequently, CDE representatives argued for a much richer, continuous and systematized curriculum, optimally approximating 1,000 hours of classroom work. Even while recognizing CDE's commitment to education, immigrant advocacy groups and affiliated community-based organizations rebutted CDE's perspective by arguing that anything such as a 1,000-hour standard was:

1) Onerous and infeasible for immigrants;

2) Prejudicial and unprecedented both in kind and in length;

3) A structural barrier to immigrants successfully remaining in the U.S., and would serve to disqualify students from legal status; and

4) At best, inefficient and almost certainly ineffective for this population, given that approximately 33 percent of the amnesty population was illiterate in their native language, let alone in English.

The Immigration and Naturalization Service, however, eventually supported a 100-hour standard, based on curriculum used by California's adult school program, even though there was not uniform support for this standard for immigrant education by adult schools.

Whatever any merits there were in the many standards discussed during the Amnesty Education Program, there was no involvement in the exploration of standards by federal representatives. They neither

arbitrated these issues nor provided models or alternative standards or curricula. Here, in short, there remained throughout the program an unproductive conflict between the short-term need for legalization and a longer-term vision of an educated, capacitated and civically-integrated immigrant population.

In this regard, even the federal administrators interviewed lamented their inability to conduct technical assistance, or have any structured information exchange among states having the most substantial immigrant populations. Whether a concurrent feature or an effect, this inability is directly related to a second critical issue: federal regulations for SLIAG were not available to states until well into the second year of SLIAG's implementation. Not surprisingly, without regulations, federal administrators could not deliver technical assistance with any degree of confidence — even had technical assistance been part of the intended program.

Technical Assistance by the Federal Government

Quite plainly, there were four overriding issues related to the federal participation in SLIAG within California. First, and foremost, both in the opinions of the federal monitors and through the experiences of education constituencies within California (and all other states interviewed) one fact stands out: federal representatives were not commissioned to, and, in fact, did not deliver technical assistance to states. Whether one envisions technical assistance broadly — programmatic, curriculum, automation, reporting or general troubleshooting — or narrowly — exploration of resolution options related to the problems associated with the implementation of SLIAG within states — the federal government failed to provide anything near an adequate level of assistance to the states. All those interviewed, including other states' representatives, reported that the only significant technical-assistance service provided by the federal government were yearly national conferences, their primary value being not the program provided, but, rather, the opportunity for states' representatives to conduct informal problem-solving discussions.

Year-to-Year Budget Allocations

Inconsistent and late yearly federal allocations led to varying, often uninformed and unreasonable expectations by the program's many constituencies, as well as a general inability by CDE to accomplish strategic planning. Although the total federal allocation to California for the five-year term of the Amnesty Education Program was $413 million, CDE had no advance notice on its year-to-year allocations.

This situation, coupled with the continuous budgetary control struggle between California's Health and Welfare Agency (HWA) and CDE, compromised the program's performance. Community-based organizations (CBOs), especially, suffered from a lack of consistency in receiving payment for services delivered. Many CBOs participating in the Amnesty Education Program were small organizations both programmatically and fiscally. To these organizations, SLIAG monies represented fundamental elements, often on a scale not previously experienced. Apart from the general challenges associated with this type of organizational growth, inconsistent payment often meant an inability for these CBOs to meet payroll demands and, so, a threat to the continued employment of their instructors, misunderstandings with creditors and landlords and, in some cases, suspension of classes pending receipt of funds.

Uncertainty as to year-to-year program funding — coupled with delays in CDE reimbursement to providers — made it very difficult for providers to develop firm plans for serving students or coordinating services with other providers. The significant delays and fluctuations in funding translated to inconsistent delivery of services to students, and substantial financial and emotional stress on staff. For example, providers were often tardy in paying salaries and rent and frequently had to borrow or use out-of-pocket money. Staff frequently had to work extra hours per day to provide and maintain quality services, even though many were not paid until the end of the year (but worked anyway to meet their heart-felt obligations to students). This situation gradually took its toll as providers could not retain their best teachers who left to seek stable work to support their families. This scenario becomes all the more risky and counter-productive when one considers the great pressure on agencies to access other program funds until their amnesty funds became available — a situation that could easily lead to fiscal irregularities. Compounding the lack of timely operating funds was the fact that more often than not state education administrators could not adequately answer even the most reasonable inquires concerning the funding stream, since federal representatives were not always able to provide timely information on the status of reimbursement. And, what was true for the education side of SLIAG was all the more true for the health side: it was not unusual for reimbursement for services delivered — many millions of dollars — to be delayed years[11].

[11] Even this negative situation could have had a positive result had education constituencies been systematically informed of the magnitude of such delays. In effect, education constituencies consistently felt that the delays they experienced were unusual, unreasonable and, to a certain extent, the result of animosity between HWA and CDE.

Here, the situation was compounded because many smaller CBOs who served as service providers became caught in a "Catch 22" situation. In becoming providers, their organizations experienced extremely high growth, both programmatically and fiscally, expanding their organizational horizons, their staff size and their service aspirations. For when Amnesty Education Program funding began to wind down — or shut down altogether — these programs found themselves overextended organizationally, with office space, support staff and related expenses that could not be borne. The impact on some of these organizations was quite negative, in that they could not regain the trust they had once enjoyed from their constituencies.

Stakeholder Participation

A fourth issue, which was not resolved or even addressed significantly during the program was the lack of stakeholders' participation in the refinement of federal perspectives. Although there was participation by education and health institutions during the drafting of the founding legislation, even up to the time of this report there has been next to no stakeholder-assisted, serious examination of education standards, valued education outcomes or transitions between SLIAG and subsequent service programs for immigrants. Apart from the wealth of experience and expertise available to those drafting and administering SLIAG, the absence of stakeholder involvement in refining the program represents a tactical error if the federal intention was for SLIAG to be a smooth-running, non-adversarial program. This is also valid for Health and Human Services' relationship with its sister agency, the Department of Justice, which houses the INS. Consistently, throughout the program there was tension between these two agencies, which, as best can be determined, was a result not only of different missions, but of ineffective joint planning and problem-solving.

Program Evaluation

Affiliated with this previous issue is a fifth concern, namely, any evaluation of SLIAG. Neither states nor local providers were directed, encouraged or assisted in conducting any performance review, assessment or research study of the hundreds of millions of dollars of services provided through the Amnesty Education Program. Even without program performance standards, some program assessment would have been possible had the federal perspective included a commitment to information development.

Summary

The hurry to initiate programs, obligate and expend funds and so redress criticisms of lack of federal responsibility for immigrants not only weakened the program and delayed its successes, but also caused a variety of difficulties. Here, the history is a chain reaction of failed expectations and basic misunderstandings between constituencies, administrative and programmatic inefficiencies, anxiety for all levels of administrators and providers and, ultimately, delays and less-than-optimum implementation of the program.

As it happened, the various SLIAG constituencies disagreed about many aspects of the program. Yet there was almost universal agreement that the legislation reflected little understanding of or sensitivity to immigrants' real education and economic needs. Education providers felt that they could have better served immigrants' educational needs, even with the same amount of money, if the regulations had been more tailored to the realities of the barriers that limit immigrants. However, to do the job right — that is, to put immigrants on track to better jobs and career ladders by ensuring that they learn basic English — California's education providers felt that federal guidelines should offer protection of education's SLIAG allotment: certainly more than the 10 percent available to the Amnesty Education Program.

Testimony given at Congressional committee meetings was not sufficient to guarantee accurate and appropriate program design and implementation; SLIAG was clear proof of this fact. Even if SLIAG is defended as a quasi-block grant to states, to use as their situations demanded, any effective system of service must be informed by "best information" if it stands any chance of approaching maximum effectiveness and efficiency. Given the complexity and volatility of service to immigrants, more than typical care must be taken. In the future, federal immigrant-directed programs must draw from and mandate practices, strategies, standards, curriculum or other facets of successful immigrant programs. The notion — expressed suspiciously by at least some representatives of every constituency interviewed — that the federal government can exempt itself from criticism on the immigrant issue by simply "throwing" money to states is at best inappropriate to the true needs of immigrants and those organizations that serve them. At worst, such a strategy underestimates the likely prospect of failure.

The fact that amnesty education operated without regulations for over a year speaks to a precedent that was never successfully overcome. It simply is not reasonable to expect scores of state

administrators, thousands of service providers and millions of clients to have to develop unique, state-specific programs, while at the same time second-guessing their own efforts until such time as the federal perspective on fundamental issues becomes clear. The adversarial, uncomplimentary attitudes expressed toward federal representatives by some representatives of California's educational constituencies speaks directly to the legacy of the regulatory failure.

Clearly, and no matter the level of states' flexibility intrinsic to federal immigrant programs, the federal government has a responsibility to promote, at a minimum, "best practice." It is arguable that at its initiation, no one associated with SLIAG — neither federal, state, nor local constituencies — had sufficient experience to confidently offer strategies for serving immigrants. It is not arguable, however, that this lack of confidence should have extended throughout the program. The simple fact that states were not obligated under the terms of the Amnesty Education Program to provide consistent, structured, readily accessible technical assistance is sufficient reason to insist that future efforts mandate technical assistance resources. Such assistance should build directly upon the results of evaluations of previous immigrant programs and efforts, and may or may not be directly related to performance reviews conducted by either federal or state authorities.

Of course, these recommendations are predicated upon the existence and application of performance standards — noticeably missing from federal amnesty education regulation. Technical assistance, then, must proceed from empirical knowledge, not advocacy per se. And empirical knowledge, sufficient to make a practical difference in the lives of service providers and their clients, can only be developed in terms of appropriate, "constituent-owned" and clearly expressed program goals and objectives: service, outcome and impact standards.

States in economic situations similar to California cannot be expected to subsidize massive federal initiatives such as SLIAG, even if by federal standards or perspectives such subsidies only last for weeks or months. Where federal programs include service providers such as small community-based operations or public health clinics, it must be stipulated that state or local planning can proceed, secure in the knowledge that payments will be regular, consistent and appropriate to valid billings; and that states will have reasonable notice and access to those federal resources sufficient to cover the costs of federal responsibilities. After all, it does little good to anyone — least of all the federal government — to attempt to redress

the perception of irresponsibility with respect to immigration by putting into place a program that promises responsible action, but consistently promotes an adversarial relationship.

Again, it is remarkable that this recommendation is even necessary, especially in light of recent federal attention to rigorous evaluation of programs, e.g. Center for Substance Abuse Prevention programs, Community Development Corporation programs, etc. Even in the event that the federal perspective was one of assuming that states would carry out evaluations for their own purposes — a perspective never expressed by the federal representatives interviewed for this evaluation — there were still no attempts to sanction, identify or analyze states' information development efforts. Without at least some attention to this task, federal responsibility for effective stewardship of public funding could not have been accomplished[12].

Similarly, there was consensus that the federal administration of the program began in arrears, and truly never gained pro-active, strategic control. Whether the focus is on translation or interpretation of regulation, technical assistance to states' constituencies, development of program performance information and/or facilitation of information transfer or the simple reimbursement of cost, federal leadership was all but nonexistent. The fact that each constituency interviewed had slightly — or in some cases drastically — different reasons for this lack of leadership is of interest, but not the compelling summary finding. Rather, the fact that the federal representatives interviewed echoed many of the complaints heard from California's own constituencies is the telling point. If those "in control" of a program express the same frustrations and limitations as the state administrators and providers "controlled", it becomes unarguable that a program is deeply flawed. This clearly was the case with the Amnesty Education Program.

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[12] For an example of a limited but informative international summary see, "A Survey of Newly Legalized Persons in California" (CASAS, 1989). CASAS validated education/service providers' early estimates concerning the relationship between students' initial performance capabilities, providers' levels of educational efforts and net increases in students' post-educational performances.

Recommendations

The recommendations with respect to effective federal program planning, oversight and administration include the following:

Recommendation 1: *Federal program planning must include authentic opportunities for consistent participation from all affected constituencies in planning any program that intends to serve immigrants.*

Recommendation 2: *Federal programs of the magnitude of SLIAG must be secure in regulation prior to states' ability to implement them.*

Recommendation 3: *A program of empirically-based, "state of the art" technical assistance must be part and parcel of any federal initiative aimed at identifying and realizing the federal government's responsibility to states for its immigration policies and practices.*

Recommendation 4: *A federally administered program such as SLIAG must be capitalized and categorically devoted to SLIAG during its lifetime. Any future federal program for service to immigrants must be free from gross yearly fluctuations and delays in payments.*

Recommendation 5: *Any program of the magnitude and complexity of the Amnesty Education Program must include provisions for performance review and options for information development directed toward program refinement and replication.*

B. Statewide Program Pre-planning and Strategic Planning

Context of the Issue

A proper appreciation of the tenor of the public discussion of immigrant issues in California necessarily would note both the range and intensity of the discussion. Whether taken as law, public health, economics, educational question, or a question of the character of a democracy, immigration represents California's most volatile current public policy issue. On one side of the public debate are the ethnic advocates who argue that immigration — legal or illegal — has a long and permissive history in America, and that both the federal and state governments have an obligation to attend to persons living within their jurisdictions. These advocates also note — as do most, if not all, educators and public health officials interviewed — that, in large part, the debate over immigration is moot because very large numbers of immigrants are residing in California. The real question is not whether these numbers of immigrants should be here, but, rather, given that they are here, how can we best serve their needs in the context of serving the needs of all California residents?

The other extreme of this public debate, not surprisingly, focuses on the perception that California does not have the educational or other public service resources to adequately serve its current residents; that the uninterrupted flow of immigrants undermines the quality of life for both long-residing and new residents; and that new laws, disincentives and preclusive strategies must be developed to stem the flow of immigrants into California. Here, the emphasis is on denying services — education or otherwise — to undocumented immigrants.

Although this evaluation was initiated prior to the explosion of immigration as a public policy issue in California, the evaluators could not help but take notice of, for instance, the many editorials written on the subject, the many pieces of legislation offered within California's legislature and the solutions offered by elected officials through the state. On the other hand, the evaluation successfully negotiated its way around this increasingly acrimonious debate, and was able to maintain a neutral posture by advancing a simple rationale: "If new immigrants continue to reside within California, what are the most efficient and effective ways that the education system can incorporate them into the fabric of the state?"

With the serious down-turn in California's economy, both the health and education systems affected by and integral to SLIAG quickly entered a competitive posture, with each holding identical

positions. SLIAG was the federal government's response to their responsibility for immigration policies and practices, as well as the effects of these policies and practices on states such as California. Unfortunately, their mutual positions degenerated into two competing interests, each presenting compelling but non-negotiable cases for "more equitable" division of California's total SLIAG resources. The "cases" — essentially differences in perspectives and mutual failure of imagination — offered by California's Health and Welfare Agency (under the authority of the Governor's Office) and California's Department of Education (under the authority of an elected Superintendent of Public Instruction) became institutionalized. In effect, the very agencies and individuals who traditionally had worked hard to serve immigrant populations' needs increasingly became involved in disputes. These disputes about policy, practice, fiscal allocations and accounting details extended deep into each agency; this set the stage for local agencies to feel that serving the needs of immigrants had become secondary to exercises of advocacy and administrative authority. These "turf" disputes, in conjunction with the fundamental difference in mission between the Health and Welfare Agency — meeting the state's public health needs — and the Department of Education — placing immigrants on citizenship, educational and career paths — became increasingly acrimonious, turning those who might have been partners into contestants.

Finally, by the admission of the California Department of Education (CDE) staff, the department was not prepared for an immigrant service program of the magnitude of SLIAG. Whether through oversight or as a result of other factors, upon implementation of the Amnesty Education Program, no staff was in place, next-to-no consultation with other immigrant-related CDE programs or staff was accomplished and, generally, the department quickly fell into a "remediating" posture making major policy, administrative and field service decisions in the interests of time and "getting the money out to the field."

Had pre-planning been accomplished to any appreciable degree it is reasonable to assume that it would have included strategies to relieve likely problems during the implementation and operation of the Amnesty Education Program. As a result of the absence of pre-planning, however, California's administration of the program began with a tone of crisis management, and continued in this modality: confronting, however successfully, late-breaking and unexpected programmatic issues such as new federal regulations and state administrative policies; attempting to mediate issues

between competing local constituencies; translating administrative demands from both the federal Health and Human Services and California's Health and Welfare Agency; and overseeing the program accounting and defending itself from constituents' charges regarding its fiscal allocation and accounting practices and conclusions.

In an attempt to make California's program more successful, an IRCA Statewide Advisory Committee was developed and included representatives of all three types of service providers — adult schools, CBOs and community colleges — in addition to CDE representatives (see Appendix B for membership)[13]. The mission of the committee, although not precisely stated and clearly not internalized in any consistent way by those members interviewed, was to oversee the program, with an eye toward assuring that resources were accessed and equitably distributed. CDE representatives to the committee increasingly were seen as staff to the Advisory Committee, certainly during the yearly confrontations between the Amnesty Education Program's constituencies and California's Health and Welfare Agency, which served as the state's fiscal agency for SLIAG funds.

No matter the eventual effectiveness of the Advisory Committee, the unfolding of Amnesty Education Program took place against the backdrop of the precedent set by the federal planning for SLIAG, described in the previous section of this report. In short, this precedent included little appreciation for the perspectives of educators, or for federal assistance in serving recent immigrants.

Critical Issues

Pre-planning

There were two primary difficulties related to the lack of program pre-planning:

- Coordination and utilization of existing education and health delivery systems

  and

- Direction within California's education community.

[13] There was, however, no participation on the Advisory Committee by representatives of California's Health and Welfare Agency.

The overriding issue here was the lack of discussion between the health and education systems — the two systems that would be directly affected by SLIAG. It was not difficult for any of the constituencies interviewed to account for this lack of discussion, if not planning, especially since the perspective of Congressional representatives is that California's health "industry" — public and private health administrators — were instrumental in drafting the final SLIAG legislation.

One set of respondents held that the lack of coordination was due an historical lack of cooperation between the state's health and education systems, with the state Superintendent of Public Instruction being an elected official and the chief state health officer — the Director of California's Health and Welfare Agency — being appointed by the governor. Respondents expressed the perspective that this institutional conflict of authority was exacerbated by clear, well-publicized friction between the governor and the state Superintendent. In effect, without a controlling mandate to cooperate, the conflict between these two officials translated into an "us against them" mentality that worked against cooperation at both the program staff and program planning levels.

A second general theme, expressed notably by representatives of the two state agencies themselves, suggests that the lack of planning was more the result of a sheer lack of direction internal to both agencies. For the CDE, their perspective here suggests simple misunderstanding or oversight regarding the magnitude of the SLIAG program and accompanying resources. Because the magnitude was not properly acknowledged, there was little motivation to devote pre-planning resources to SLIAG. The additional suggestion by representatives of both systems was that it was reasonable for the health system to under-appreciate the need for or benefits of joint planning with education, since the SLIAG funds were always planned as a supplantation resource to support California's public and indigent systems of care. As it happened, SLIAG health resources did serve to supplant state public and indigent resources with dollars being substituted on a one-to-one basis.

Finally, less an issue than a common complaint from representatives of both the health and education systems was the insufficient prior notice from federal officials of the precise (or even likely) character of the legislation and resulting guidelines and regulations. Suffice it to say that pre-planning in California was for all practical purposes non-existent.

The evaluators have no reason to dispute any of these criticisms, since no constituency interviewed — federal officials, state department officials, service providers or students — disputed them. Further, when comparing California to other states with significant amnesty education programs — Florida, Illinois, New York and Texas — California seems to have been deficient in its program preplanning.

In contrast to California's experience, other states' SLIAG administrative organization — governors' offices, or State departments — appear to have been well informed concerning SLIAG prior to program implementation, with staff and support services identified and devoted to the new program. Even accounting for the differences in scale between California and the comparison states — California being larger in every relevant respect — other states seemed to have been better prepared to "hit the ground running," with services tailored to the prevailing needs and conditions of immigrants and the service organizations.

Each of the comparison states was able to bring to bear strong state administrative authority. How each state accomplished and maintained this authority differed, but each was able to provide stable, responsive administration. This was certainly true in their roles as quality-control agencies for authorizing and maintaining contracts with proposed or actual service providers. For instance, in Florida, all amnesty education providers must have had prior experience in delivering education services consistent with state-approved educational guidelines. As opposed to merely meeting the educational requirements of the INS, Florida's Amnesty Education Program was designed simply as a "capacity increase" of their long-standing system of services to new immigrants. They could now serve more immigrants, since SLIAG and participants were folded into their existing system.

Once SLIAG was authorized, the comparison states quickly were able to identify service providers, deliver curricula and operate outreach mechanisms that already were sanctioned by state administrators and consumers. Even when outreach and curricula had not been developed fully by the time SLIAG became operational (notably, Texas and Illinois), these states built upon existing relationships with agencies that had served the education needs of immigrants. In some cases — Texas and Florida — the program effectively built directly upon pre-existing systems for serving immigrants' needs with regional contract administration, fiscal reporting and auditing, and quality assurance monitoring.

Of special note is the fact that Florida's preparation included more than a service system. It also encompassed a state-sponsored planning task force, with representatives from state departments of corrections, education, health, labor, community affairs, mental health and economic services. Given their initial perspective that SLIAG funds were available to reimburse for services — not to develop new programs — this task force saw SLIAG as a "one shot" augmentation of their ability to provide more of the quality services they had developed in response to the Cuban migration of the 1960s. This limited-term perspective translated to very little friction between health and education constituencies, as evidenced by Florida's allocation of nearly 30 percent of its total SLIAG resources to education.

In Illinois' case, the overall responsibility for program administration was granted to a large well-established CBO, which itself had existing relationships with other community-based and education organizations which had served immigrants' needs[14]. In New York, the State Department of Education contracted with four literacy proficient agencies[15] that, in turn, then subcontracted out to their own constituents, each of which had direct experience in delivering and contracting for educational services for immigrants. Texas, on the other hand, simply utilized its existing system of adult education. Likewise, Florida took advantage of their well-established, 67-county adult education system for serving immigrant educational needs.

Also, the comparison states were better able to protect their programs from partisan political pressures (or not be subject to them) whether or not these pressures were related to immigrant issues or services. California's experience included more or less continuous conflict:

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[14] For Illinois, using a "prime contractor" — the Jewish Federation of Chicago — was judged wholly appropriate to clients' needs due to the fact that nearly all of the amnesty education program was centered in the Chicago area; over 80 percent of the SLIAG-eligible population were Spanish-speaking, thus negating the need for multiple service deliverers; and the contractor's organizational stability and experience in managing large service programs.

[15] In New York, each literacy proficient agency had long-standing experience in providing client-tailored education services. The LPAs included the New York City Board of Education, which subcontracted with public schools; the New York City Community Development Agency, which had experience in subcontracting with area community-based organizations; the City University of New York, which subcontracted with four of their system's colleges within New York City; and the State University of New York (two-year college development center) which, in turn, subcontracted with public schools, CBOs, and private and public colleges outside New York City.

1) Among the three types of service deliverers: community colleges, CBOs and public adult schools;

2) Between the governor (and the public agencies over which he had authority) and the elected Superintendent of Public Instruction;

3) Between the state's designated SLIAG fiscal and programmatic agency — the state Health and Welfare Agency — and the California Department of Education; and

4) Within the body politic over the rights of immigrants to freely move across California's borders and access public services.

In the two most illustrative cases, Florida and Texas, the political dimensions of amnesty education were mitigated by the existence of state-sponsored councils. In Florida, this council included all state agencies likely to be involved in amnesty education, all of whom had experience in working together to serve immigrants' needs in a relatively coordinated fashion. This coordination extended to the local level, where Florida's 30-year history in dealing with large numbers of Cuban refugees/immigrants forced cooperative arrangements and with it, the resolution of major political issues. In addition, because Florida's experience had been with Cuban and Haitian populations, the state had a long history of working through program design, implementation and political issues with the federal government.

Texas, on the other hand, did not have an existing council prior to the availability of amnesty education. However, once SLIAG was authorized, Texas did develop a coordinated planning team at the state level. Together with this planning body, Texas has a long history of integrating Spanish-speaking populations within its body politic, as well as a long-standing legislative commitment to "education for its own sake." Spanish-speaking populations were viewed as "us" rather than "them," and since Spanish-speaking populations were the primary population to be served by SLIAG, very little effort was needed to ensure that the SLIAG program was secure from political interference.

Perhaps more importantly, Texas took a strong position that all providers who wanted to be involved with the program:

1) Must be administered through one of the 60 regional administrative offices within the state;

2) Must demonstrate in their proposal how they will coordinate with other providers within the regions; and, most importantly,

3) All providers who did not have a demonstrated history in providing education services must accept a similar arrangement in which their facilities and support services would be used, and they would have supervisorial responsibilities, but all instructors would be brought in from outside and recognized education providers.

As stringent as these conditions were — and some CBOs fought them early on during program implementation — they were part of Texas' successful orientation toward the service provider community: "No one will get everything, and everyone will get something."

Coordination and Utilization of Existing Education and Health Delivery Systems

The first precise pre-planning issue, then, is the lack of mutual utilization and coordination between the health and education systems. In this regard, a wealth of perspectives were gathered through a series of interviews with county public health directors and representatives throughout California.

Given the past, current and likely future magnitude of immigrant needs in California, there was and will remain ample friction between the health and education systems over the distribution of SLIAG or other funds for services to immigrants. Consequently, this component of the evaluation sought to explore ways that the two systems could be identified with the true aim of SLIAG in order to assist states in meeting the service needs of amnesty and immigrant populations.

The fact of little prior coordination between service systems was not unexpected. However, what was surprising to the evaluators was the apparent lack of interest expressed by the majority of interviewees in exploring how the two systems could work together, whether toward a vision of effectiveness or efficiency. As the interviews proceeded, it became evident that local public health systems perceive themselves as under duress. This evaluation found that the public health systems have been unable to expand their vision beyond attempting a basic level of service in the face of rapidly expanding need. Health officers argue that there was and is

no time for local health departments to plan that is not directly related to ensuring the maintenance of the current public health systems, unless there is clear evidence of increased efficiency or effectiveness, and incentives for coordination or new resources.

Part of the health departments' perspectives are the results of utilization reviews, which tend to show that SLIAG-like populations do not access public health services at unusual levels[16]. Although not within the bounds of the evaluation per se — and so uncorroborated — several interviewees maintained that their own utilization reviews suggested that SLIAG-like populations did not tend to use local services at either more frequent or more intense levels. As with all indigent populations, SLIAG clients tended to have a higher incidence of acute conditions, and so used emergency room services at a higher rate. In general, they tended not to be in touch with preventative techniques or programs, were nervous about contacting any public agencies due to concerns over their residency status and often came to this country with previously existing chronic conditions that were well established.

The implications of this situation are clear. First, without greater coordination between schools and public health departments — directed toward new immigrants — prevention of negative health conditions and remediation of chronic conditions prior to acute status will not be maximized. Second, without the systematic inclusion of schools, local health departments' efforts to educate and isolate infectious persons — and so preclude epidemics — will not be successful. In the same way that school settings are assumed to be the best mechanism for disseminating information about a host of issues — child protection, family well-being, substance abuse, etc. — the schools have the potential for being a potent partner in promoting public health among populations who might otherwise not be accessible. Third, it is classic inefficiency for the two service systems to be promoting public health in an uncoordinated manner. Apart from the costs of duplication of health education services, there is ample potential for school staff to be trained by public health educators, thereby:

1) Increasing the knowledge and training capabilities of local school staff;

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[16] This finding should not be surprising, since, to some degree, the poor/indigent, undocumented immigrant population and its demands for service will be offset by their fear of exposing their status by visiting public health agencies.

2) Helping to educate public health staff on the health-related responsibilities and assets of local schools;

3) Laying the groundwork for closer cooperation between the service systems with respect to identifying health problems and making consistent and appropriate referrals to health services;

4) Assisting public health staff in ensuring that courses of treatment are completed (currently, a major public health issue related to serious communicable diseases such as tuberculosis);

5) Maximizing joint use of facilities and so providing health and education venues most likely to be accessible to immigrant populations; and

6) Consolidating viewpoints between the two systems at the local level, which could serve to undercut the unproductive relationships between the two systems at the state administrative level[17].

This is particularly the case if school personnel training can be incorporated into local staff development protocol, such as during presentations of health education to students by public health personnel.

The single most obvious and important point is the clear and universally held position that SLIAG was a cost-reimbursement program to states for costs incurred in serving immigrant populations. The centrality of this position within health departments cannot be overstated. All those interviewed insisted that the intent and terms of the IRCA legislation was cost-reimbursement for direct services, not the development of new services. From both the state and local public health perspectives, SLIAG monies represented a federal recognition of its responsibility for new immigrant populations, given the variety of health services that individual states are responsible for providing.

The second most obvious and important finding is the fact that in California SLIAG monies quite clearly were a supplantation of state

[17] It was quite interesting to note that the friction between the Health and Welfare Agency and the Department of Education were not mirrored at the local level. On the contrary, the almost benign neglect between the two systems at the local level most often was accounted for by the insight that SLIAG had little to do with the state, so the state's internal skirmishes had little to do with locals.

funds for public health. In fiscal terms, the availability of federal funds resulted in a "zero-sum" situation, with a reduction of state funds and a substitution of federal funds to county public health agencies on a dollar-for-dollar basis. This fact is quite important to the prognosis for coordination between education and public health, since from a public health perspective SLIAG funds, as well as the SLIAG-eligible population, were more of the same. There was no change in resources and no change in reimbursement for services to the very populations they had already been serving with state resources. Since public health agencies are obliged to serve whoever walks through their doors, the most substantial change encountered by public health agencies was the process for recovery of costs associated with service to amnesty-eligible/certified patients[18].

Third, of note in interviews, was the widely held position that public health serves "whoever walks through the door." From a public health perspective, if people need medical or health-related services, they should receive them. Apart from this general commitment to serving people in need, there was no tendency by those interviewed to highlight specific populations as more deserving of service. Quite the contrary, except for those suffering from serious communicable diseases, the public health perspective clearly was defined only by economic status, not culture or ethnicity: service for those who could not afford private health services.

A fourth, and less obvious feature of the interview responses, was the near absence of planning for coordination between the health and education aspects of SLIAG. Whether the notion of coordinated health education, shared service sites, etc., none of the public health representatives had visions, much less significant experience, of how the two service systems might be better integrated toward the satisfaction of immigrants' total needs. In a sense, this fact is not surprising, since the crisis in health care in California likely demands all the imagination public health providers can muster. It is surprising, however, that not one of those interviewed could offer

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[18] This includes the possibility that when a claim is made for SLIAG reimbursement for what is believed to be an amnesty-eligible/certified patient, that patient may be found to be ineligible/non-certified, which means that the health services delivered will not be reimbursed through SLIAG. Consequently, public health departments were at risk for reimbursement in all cases where the patient could not provide adequate documentation of legal status. Unfortunately for the public health system in California, this situation of risk is "business as usual," since all facets of the system are responsible for delivery of care no matter a patient's ability to pay, and no matter the availability of resources — a ridiculous situation indeed!

any examples of proactive contact by SLIAG educational programs or service providers concerning coordinated activities. Considering the compelling health and education needs of indigent populations, and the range of education, health and social service needs of immigrants, it is fair to say that the absence of coordination represents a lost opportunity for both immigrants and the service systems[19].

On this point, there was mixed interest in such coordination. Responses ranged from "What is there to coordinate? They (education) have their issues and we have ours." to "We need to explore coordination, but we're not even able to meet *our* patients' needs, let alone do extra-system planning." What is missing are incentives for coordination of services to immigrants[20], and a full mutual appreciation of how the two service systems could complement each other. A point of consensus, however, was the unresponsiveness of the federal reimbursement protocol, from options for claiming reimbursement, to the extraordinary delays (1-2 years) in actual reimbursement[21].

Where there was a difference of opinion, it was primarily attitudinal, reflecting a range of interest in even thinking about systems other than their own. At one extreme, respondents wondered why they should be concerned with anything other than maintaining the status quo. Even in the face of federal proposals to reduce categorical funding and to view services to immigrants as a unified "client-base," these departments expressed little interest until incentives or mandates were provided. If nothing else, the lack of interest by such committed, intelligent, highly educated, experienced and caring professionals is an indicator of California's health care (and general public service) crisis.

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[19] Such coordination would set a precedent that could have benefits beyond service to immigrant populations. Clearly, the examination of artificial categories of service — health, education, family support, etc. — could redefine a unit of service, both for services and individuals.

[20] The likelihood of incentives in at least one case, may be poor, as demonstrated by the San Diego Board of Supervisors which recently voted to decline new federal or state funding for services to immigrants.

[21] Although this point has little to do with the potential for coordinating services between the health and education systems, the few health representatives aware of the reimbursement protocol for SLIAG education providers were envious of the clarity of claims submission procedures and the timely reimbursement. This fact might have a bearing on attempts to unify local service systems, at least to the extent that health administrators likely would expect that education administrators could ensure timely reimbursement to those in the new, unified service system.

At the other extreme — one health department in particular — explored possibilities for coordinating health and education services. The six health professionals in the meeting began to explore the possibility of joint planning, joint grant application, a single "neutral" fiscal agency for grant administration, joint training and operations, multi-use of established sites, and a client/family-based approach to immigrants' needs. The remainder of those interviewed were non-committal, with respect both to the concept of coordination and the feasibility of local coordination when suggested by the evaluators. One suspects these health departments are experiencing an institutional fatigue that might be addressed through incentives.

Direction within California's Education Community

A second planning issue follows from the fact that California has little experience in cooperative relationships between state agencies and often suffers from lack of coordination between constituencies, programs and services within departments or agencies. For instance, CDE's early perspective on the Amnesty Education Program was that it would be implemented through adult schools. The initial orientation of the program toward adult schools and the later controversial addition of CBOs and community colleges worked against developing unified program goals. Initially, CDE would have preferred that program funds go directly to California's adult schools program, with no inclusion of community colleges and local CBOs[22]. However, the initial perspective that including these parties would mean needless complication changed into the perspective that, with sufficient planning and coordination, a system allowing the strengths of each player to flourish would be the most effective. A unified system could provide the greatest coverage for the population, guarantee best access to populations of interest and result in higher enrollments and rates of referral to needed social, health and educational services, etc. However, the integration of these became a second responsibility for all parties, notably for CDE.

Given the magnitude of the educational resources coming to CDE, it is difficult to understand how there was no pre-program identifica-

[22]One respondent, however, suggested that this orientation toward adult schools was always unrealistic since 1) the adult school standards likely were too stringent, and would effectively preclude immigrants from successful completion of a legalization or any other program, 2) adult school standards and curricula were not sufficiently tailored toward the characteristics and aspirations of immigrant populations, and 3) adult schools have insufficient support services for their general populations, let alone new, significantly illiterate immigrant populations.

tion of "resource centers" to serve as advisors to CDE's statewide efforts. Apart from the expertise of the initial staff — largely local educators "on loan" to CDE — there was a remarkable lack of utilization of organizations, programs and individuals who had long service to immigrant populations, or even an attempt to assess needs or inventory the resources of community colleges, adult schools or CBOs.

Had there been such pre-planning, the strengths of the three providers could have been mapped to reveal the several things. Adult schools have a long history of providing educational services to students with marginal literacy and academic skills. Adult schools have validated testing and assessment systems for ensuring placement of students at appropriate class levels. They typically have time-tested curricula and are oriented toward workforce preparation, lifeskills training, vocational training and career development. They also have a long history in providing education and family counseling services at varying levels. Adult schools demand certificated staff and have extensive staff development and quality-assurance systems. Adult schools are experienced in dealing with large numbers of students, using validated techniques for bilingual, ESL, and general language training and education. Adult programs can be located at practically any neighborhood school, so the possibilities for delivering education services within immigrants' communities rival the CBOs.

Against the backdrop of these resources, adult schools do have liabilities that directly bear on the roles of the other two providers. The central weakness of adult schools is that few adult school instructors come from recent immigrant cultures. The preponderance of adult school instructors are Anglo or African-American, which serves as a disincentive for participation by immigrant populations.

CBOs have well-defined strengths: the most culturally-appropriate settings; intimate familiarity with students' language and cultures, a less threatening — "official" or "institutional" — atmosphere; and in many cases, a "one-stop" center for a variety of educational, social and health services. Although adult schools are making gains, CBOs retain an overwhelmingly greater number of ethnic teachers who can address the cultural needs of students. CBOs can provide a different model of education experience tailored for migrant students, who are often illiterate in their own language while ignorant about school and studying.

CBOs can provide initial screening of students and referral to vocational and regular education agencies. These agencies — adult schools, community colleges, and CBOs with more comprehensive

educational programs — can provide higher-level testing and education services. CBOs also are specially adept at providing students with "survival English." Following an academic assessment, CBOs can help students with basic social services — health care, legal assistance, transportation, child care — that enable them to more successfully access education programs. These services also allow students better preparation for the world of work, both in understanding the community, and being familiar with services as they enter or continue in the work force.

Typically, CBOs can operate with less indirect cost than more traditional service providers such as adult schools and community colleges. In addition, CBOs can provide additional and more consistent, open entry-and-exit courses, as well as flexible scheduling and location of classes. This flexibility is very important where potential students suffer from lack of transportation, child care, and a fear of leaving their own neighborhoods, while adult schools and community colleges either are precluded from delivering these services or cannot deliver them effectively. Finally, CBOs have much greater latitude in sponsoring political advocacy on behalf of immigrants.

The primary weakness of CBOs is clear. With few exceptions, CBOs do not have a history of providing education services consistent with the quality of adult school and community college curricula. More often than not, CBOs use less than fully qualified instructors, and their staffs are not professional. Most CBOs do not have insufficient expertise to design quality assurance standards and controls. In addition, some CBOs express an antipathy toward professional standards and quality assurance, arguing instead for non-traditional techniques, informal business standards, and curricula which are not replicable.

The third partner that could have set the stage for the initiation of the Amnesty Education Program was the community college system. However, insufficient planning hampered the integration of California's community colleges into the program. Integration was labor-intensive, late and demanded an extraordinary level of attention from the community college system. Apart from CDE's lack of knowledge about the community college system, community colleges themselves had no organized response to the mandate that they participate in the amnesty program. Traditionally, the community colleges had not served new immigrant populations and expressed nervousness concerning:

1) Clear governance for the program;

2) Educational goals for the many immigrants who would access community college or other education services;

3) Program resources available for support services, such as the educational, career and personal/family counseling that community colleges typically deliver in the context of their overall education mission; and

4) Clear resources for guidance approaches to immigrant education at community college campuses.

The community colleges increasingly were obliged to deal with curriculum, logistical, implementation and governance issues themselves, through a 10-campus community college consortium. Although this "self-help" approach was productive, the need for community colleges to band together was not an efficient way of coordinating with the other amnesty education service providers or the CDE.

Had better planning and coordination occurred, the CDE would have learned that community colleges are experienced in providing services to students who have basic literacy in their own language, some advanced work skills and some English skills. Community colleges are a very appropriate setting for students who are ready for a more challenging course of study, for career development or higher education. Community colleges can offer counseling services, even where education programs do not subsidize them, as was the case with amnesty education. Community colleges use well-educated, experienced staff and extensive staff development and quality-assurance systems. As with adult schools, community colleges have developed validated techniques for bi-lingual, ESL and general language training and education. And, without question, community colleges have both an academic as well as a practical interest and expertise in preparing students for jobs. Their expertise includes testing, placement, vocational training, non-traditional/learning-disabled teaching and, increasingly, ESL and lifeskills English.

The weaknesses of community colleges are quite well-defined. First, community colleges typically are inconveniently located for amnesty populations. Second, community colleges could only be effective for "higher functioning" students, those with good to very good literacy and academic skills. Finally, the instructional staffs of community colleges do not reflect the cultural and ethnic diversity of immigrant populations.

In general, since no pre-program resource inventory was completed, it is not surprising that implementation of the program was marked by mistaken projections and an insufficiently comprehensive viewpoint regarding both providers' and students' needs. Specifically, a lack of supported counseling components and services during the life of the program had a detrimental effect on students' educational progress. Without these support components, students' needs could not be served effectively and consistently. Given the separation of amnesty education from California's long-standing Migrant Education Program, CDE could not provide practical information to program operators regarding particular needs of immigrant populations including:

1) Cultural-specific factors that must be taken into consideration for effective educational programs and services;

2) Cultural-specific barriers to education efforts; and

3) The co-dependency needs of immigrant adults and their children, such as the influence of English instruction on household languages and cultural practices, and the impact of K-12 children and parents gaining literacy at the same time.

Based on the lack of planning, the program could not devote varied resources corresponding to the special needs of students[23]. On the contrary, the program delivered a set number of hours toward a set curriculum, for a set "unit" cost. Consequently, no one associated with the program could reasonably expect actual competence by the majority of the program's graduates. Moreover, given the perception on the part of many service deliverers that the 40-hour curriculum was radically insufficient, it was difficult to "sell" the need for any serious assessment of impact. And, finally, any testing or gathering of demographic or residency information was and continues to be problematical due to the traditional reluctance of immigrants to provide personal information to "the authorities."

Assessment and appropriate routing of students were also ineffective and non-systematic. There was no regulatory or consistent programmatic focus (or ancillary services available) on matching

[23] One respondent offered the Individualized Student Assessment Measurement (I.S.A.M.) protocol as a viable option. This protocol was never consistently or adequately applied to contract providers. However, their limited attempts did suggest that with sufficient resources the protocol had promise; it was viable for all service deliverers, and it could provide a level of detail that would accurately portray increases in students' competence.

students to the most appropriate educational setting. In effect, the program made no systematic differentiation among students with special needs, students with marginal skills, and students with basic literacy or English skills ready for more challenging courses of study. Not surprisingly, then, there were no systematic "real world" performance standards for students, which led to further discontinuity between graduates' academic achievement, eventual employability, their expectations and the world of citizenship and work[24].

Strategic Planning

There were three primary difficulties related to the lack of program strategic planning:

- Coordination between CDE and HWA;
- Technical assistance to providers; and
- Utilization of in-house expertise by CDE.

Coordination between CDE and HWA

One serious issue throughout the life of SLIAG in California were unclear and non-productive relations between CDE and HWA. For instance, full gubernatorial discretion on the allocation of program funds to state agencies did not necessarily serve the best interests of program administrators, program operators and students. In the first year of the program, the governor agreed to a certain configuration and allocation of funding — indigent care and educational components — but the Department of Finance seriously modified that configuration mid-year, and, on behalf of the Governor's Office, developed a new configuration to decrease the total resources for education. Moreover, the administration's final decision to allocate 10 percent of the total budget to CDE did not specify budget year allocations. This allocation formula was not helpful to CDE staff, who was caught between the administration's position that the program would receive 10 percent of the total funds available over the life of the program, and the need for clear direction by the administration on the year-to-year allocation of this 10 percent funding.

[24] The use of performance standards, such as the measures developed, tested and used by California's Job Training Partnership Act (JTPA) program, could have provided feasible alternatives to traditional testing and graduation standards.

This constant battling yielded statewide confusion over the actual percentage of SLIAG funds devoted to education in California. This confusion became so institutionalized that, notwithstanding the fact that total allocations of SLIAG funds to CDE are public record, there remains a sizable constituency who claim that the Amnesty Education Program did not receive a full 10 percent of the total SLIAG funds. As far as can be determined, there was no cooperation between CDE and HWA.

The effects of this fiscal battling were not limited to fiscal and accounting practices, but extended into a wide-spread, intensely held feeling by all of the Amnesty Education Program's constituencies that the educational needs of immigrants were not even given cursory consideration by the governor's office and HWA. However, fundamental issues of program composition, governance, administration and, more importantly, the overall mission and vision of SLIAG in California quickly polarized the two agencies. Initially, California's Department of Education, in conjunction with the Community College Chancellor's Office, developed the California State Education Plan for SLIAG (1988) which had two main goals: a required 40 hours of classroom instruction and continuing education beyond the 40-hour amnesty provision. In the minds of the majority of those interviewed, these two goals were not met. Not all amnesty-eligible immigrants completed even these limited goals, and continuing education was not available in appropriate forms, locations and intensity for many amnesty graduates.

Even in the face of an early assessment by the California Community Colleges Board of Governors, HWA maintained that a 10 percent allocation to educating immigrants was both a reasonable response to actual educational needs, as well as a prudent allocation given California's need to reimburse costs associated with health services to immigrants and its need to balance state general fund allocations by supplanting county health budgets with SLIAG funds. In its 1989 report, the Board of Governors suggested that amnesty's two goals were not attained due to the following:

1) Inadequate federal SLIAG funds for the full needs of all amnesty-eligible persons;

2) Inconsistent state support for full funding for the programs designed for the amnesty education population;

3) Inadequate education services at all colleges;

4) Low participation in education by the amnesty and immigrant populations;

5) No state community college coordinating and leadership unit (until 1989) to help design and support programs for this population;

6) Concentration of the amnesty population in a few counties (800,000 in L.A. county alone); and

7) No comprehensive state plan to serve this population beyond the minimal (40-hour) requirement for INS certification.

HWA took no position or action when presented with these findings.

Technical Assistance to Providers

A second critical issue was the absence of procedures for refining and sustaining the technical assistance functions of CDE. During the early days of the Amnesty Education Program, visiting educators — practitioners from local school districts — were contracted to assist in start-up. In large part, the technical assistance delivered by these consultants was related to federal expectations and mandates, reporting, billing, payment and the conditions for completing their yearly contract with CDE. This technical assistance, however, was short-lived. The consultants' contracts were not renewed after the second year of operation, and the legacy of state technical assistance never developed past what was essentially advice and assistance in accessing funds.

Service providers interviewed (notably, CBOs) emphasized two factors: receiving ongoing support (technical assistance and consultation) from the Department of Education and forming local support networks or cooperatives.

Although there were no specific incentives or mandates from the state for service providers to explore technical support resources with other local providers[25], nevertheless, a number of CBOs and

[25] For the future, one respondent suggested that although the program encouraged coordination between all three service-provider types, something more than encouragement would be more valuable. Another respondent suggested that the most effective system for serving immigrants is one that is flexible; and capable of dealing with a fragmented care system, with many kinds of players, and where many are part-time, non-union, categorical service deliverers.

some adult schools established student-referral services and other cooperative activities with local agencies. Some CBOs collaborated with local health agencies to provide free health information, testing and screening, as well as some illness-prevention and health education services. CBOs also collaborated with local school districts to provide ESL and citizenship curricula, and cooperated with local churches and community organizations to provide additional space for classes. Several providers (mostly CBOs) asked for and received support services from various outside organizations, e.g. computer labs from the JTPA; assistance in completing required paperwork from the INS; social services from community service agencies; and speakers from the California Highway Patrol, county health services, Planned Parenthood, local community colleges, INS, and parks and recreation departments.

When asked if it would be feasible to require service providers in a local area to become knowledgeable about other local providers, most of those interviewed responded that it might only if there were clear and consistent rules or incentives and they had the flexibility to choose with whom they collaborated. After discussions on the dynamics of successful local collaboration, however, it became obvious that it was certain individuals rather than agencies who made effective technical assistance and collaboration possible. Thus, local collaboration would not work unless individuals within local agencies were committed.

Suggestions on requirements or criteria for forming successful local collaboratives included: a well thought-out, specific delineation of budgets and organizational objectives; clear instructions on who is responsible for what services to which students; and one overall administrative arm (perhaps, from the state).

With respect to support for service providers from the state, providers agreed on the following:

1) *Clear and consistent performance expectations, goals, and guidelines* ahead of time for service providers so that program auditing and monitoring can be done fairly;

2) *Better screening for service providers*, particularly CBOs, to ensure that they offer a "minimum of core classes" and "quality curricula";

3) *Time, funds and on-call technical support* for providers to establish curriculum standards, and to hire and train competent teachers and instructors;

4) *Technical assistance*, especially for CBOs, in longitudinal tracking and data collection on student's pre-post program educational status, job/career experience, family status, etc.;

5) *A program of unannounced visits* to monitor service providers and instructors with the express purpose of assessing the extent to which students are provided with effective and culturally/linguistically appropriate services;

6) *Clear funding guidelines and a stable reimbursement schedule*, with consistent and predictable advanced notice of funding amounts for each service year;

7) *Categorical funding for community colleges and adult schools to hire more counselors;*

8) *Categorical funding to establish childcare facilities and transportation services* for immigrant students. These critical services could be administered by "third parties" such as local city or county agencies[26];

9) *Reduced paperwork* required of service providers and, for CBOs particularly, technical assistance in completing paperwork, for instance through an 800 number hot line; and

10) *Special support systems* for immigrants who have received amnesty certification and who wish to further their education.

As was true for the federal planning of SLIAG, the absence of any substantive participation of educators and education organizations in refining the state's technical assistance to agencies that served immigrants hampered not only the operation of these providing agencies, but served to reinforce an adversarial spirit between providers and CDE, as well as left CDE without the best information should they attempt to refine state perspectives and procedures.

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[26] It was felt that provision of these critical support services would enable all three types of service providers to become more accessible to all students. This view was reinforced by a CBO administrator who noted that many students, especially women, were lost to its education program after 40 hours simply for lack of childcare services.

Utilization of In-house Expertise by CDE

A third issue, affiliated with strategic perspective or involvement of California "stakeholders," was the low level of interaction between CDE's amnesty unit and a long-standing expertise within CDE: the Migrant Education program. Contact with Migrant Education staff might have allowed the Amnesty Education Program to assist local providers with one of their most difficult tasks: accessing "hard to reach" and "hard to serve" immigrant populations. As it happened, the program did not include any technical assistance or incentives for program operators to access the appropriate populations. Without such assistance, not only was the basic mission of amnesty education blunted, but the program naturally tended toward "creaming": serving the easier to reach and serve populations.

The fourth issue related to the state-sponsored technical assistance: the lack of any clear perspective on the true organizational and programmatic needs of local service providers. Since there were extremely limited performance reviews of providers, a "no fault" program would have served as both a remedy for providers' needs and as a way of empirically cataloguing the range and quality of services delivered. Even those initially involved with the program understood the varied quality of organizational and service delivery sophistication among service providers. State administrators simply had to *assume* organizational competence and could never be certain that the program delivered quality services, or that the providers they administered had internal administrative and instructional integrity and competency. Because of workload and contractual oversight, providing the minimal pro-active technical assistance meant that program administrators were obliged to "fire-fight" problems.

For the life of the Amnesty Education Program, there was an unproductive tension here. State administrators were forced to assume the competence and organizational soundness of providers, while at the same time they needed to confront a breadth of provider difficulties, ranging from sophisticated cost-reimbursement questions, to basic questions of federal intent and providers' reporting responsibilities. Because of the absence of a systematic program of technical assistance, administrative staff were not fully informed concerning possible, field-generated solutions to problems. And, without a systematic program of technical assistance, they were not able to offer solution options to anticipate the many issues that limited the effectiveness of the Amnesty Education Program.

Summary

Any productive immigrant-oriented program operating in California should have defined program goals and roles for provider agencies–Health and Welfare Agency, California Department of Education and the INS–so that they are cooperative, not competitive. Given the volatility of immigrant issues, such a program may initially require a neutral party to facilitate the process. Based on the evaluation data, the most effective immigrant education system would involve a cooperative structure. There would be networking strategies between state program administrators and local service providers. There would be comparable levels of cooperation among the three types of providers: CBOs, adult schools and community colleges, with students having their choice. Each provider would be equipped to either conduct or arrange for tailored outreach services that would be conducted by the most effective provider; since a model system should not demand that a full range of services be provided by every service provider.

Moreover, in a model system, students should have confidence that each provider represents a valid entry point into the SLIAG system — CBO, adult school, community college, public health facility, etc. And, each entry point must adhere to well-developed, consistently applied standards that build upon the previous experiences of similar organizations and individuals. Students should be assured that whatever their "point of entry," the program has met clearly defined criteria and competence requirements such as service experience, resource capabilities and support through participation in local, regional or statewide cooperative networks.

California's lack of planning set the stage for something less than a model system. Prior to and throughout implementation, as well as during the last days of SLIAG, the legacy of California's uncoordinated approach has been clear. At the state level, there is no evidence that the lessons of such unplanned, uncoordinated, and ultimately inefficient approach have been learned. Whether from the Health and Welfare side or the CDE side, the current and likely future system of service to immigrant populations will remain parochial, fragmented, lacking in clear policy and mired in political and program-bound recriminations. In short, at the state level, California seems no closer to joint planning and service delivery than it did prior to SLIAG.

Happily, the story is somewhat different at the local level, where local officials and providers have chosen to examine the postulates

that have driven California's categorical health and education systems. Especially in the San Diego area, an immigrant service network is unfolding, using the holistic concept of a range of "client-based" services as their orientation. Similar to the systems operating in Florida and, to a lesser extent, Texas, this new approach does *not* define a client's needs in terms of the categorical services available within the service system. Rather, it aims at a coordinated system of services, with early assessments of clients' full range of needs. Although such a network does not yet fully exist in California, and even in San Diego does not include the full range of health providers, still the level of local progress proceeds in stark contrast to state efforts, whether legislative, executive or departmental.

On the assumption that California's executive branch most likely will continue to receive federal immigrant-related resources, and assuming these resources remain the major funding source of immigrant services, it should be a condition of funding that all agencies under direct authority of the governor take part in feasibility and implementation planning prior to receiving resources. In effect, no agency under the authority of the governor's office can access immigrant-related resources without complete participation in program planning. The executive branch should not depend upon a system of naturally occurring incentives, but should provide standards and incentives for planning participation.

The standards for participation should be clear and compelling. And, the incentives offered should revolve around the opportunity to by-pass strictly categorical uses of resources and, instead, promote systems of service that respond to that particular jurisdiction. Such incentives should not be artificially limited — should not be conceived of as limited-term, timid "pilot programs" — but should build directly on prior local experiences in private or publicly-funded collaborations between service providers and systems. With the wealth of "collaborations" currently underway in California, an incentive package for participating in coordinated planning should not assume that the major aspects of a collaborative approach "remain to be proved." The value of both non-collaboration and collaboration is well understood even now within federally-sponsored and philanthropic model programs. Without incentives and strictures, productive change is not likely, and without productive change, services to the large and growing immigrant population in California will remain fractured, inefficient and less effective than they otherwise might be.

To access immigrant-related resources, state-supported organizations that serve or can serve immigrants should be obligated to document their recognition of local service and technical assistance needs and resources; their intentions and current efforts to bring to bear such expertise in planning local service networks; and the extent to which they have a comprehensive inventory of resources at-hand. These resources would include validated curricula and established outreach service strategies, access to other service providers, and technical assistance resources consistent with contingencies likely to serve new immigrants.

As part of the planning mandate, the state authority should be mandated to proactively produce a preliminary directory of immigrant-related expertise for all public and private non-profit agencies not precluded from receiving public funding; oversee the production and distribution of a revised inventory of expertise, as a result of the review of information gathered from the field during planning activities; maintain a clearinghouse of "best resources;" and provide limited "on-call" information services.

The program planning included an under-appreciation of both the magnitude and possibilities of SLIAG. Associated with the issue of possibilities was that as the founding legislation neared passage, and immediately afterward, there was little evidence that the federal government was positioned to effectively promulgate SLIAG regulations or administer the program in any sort of timely fashion — a double-edged sword for California. On one hand, this lack of capacity proved to be an additional stress to the implementation of the program. On the other hand, with sufficient notice of this possibility, California agencies would have been relatively free to develop the kinds of innovative approaches found in other states.

In short, the governor's office — or the administrator of record — should take responsibility for coordinating legislative tracking of all immigrant-related federal and state legislation, and should go beyond the regular joint meetings of agency representatives under the governor's authority. Included should be special "tracking briefs" for executive staffs of all state agencies, including those not under direct gubernatorial authority. In addition, these briefs should include the general characteristics of the legislation, a general assessment of implementation flexibility, aimed at coordinated approaches, suggestions of the relative roles of individual state agencies and local service providers, and an informed prognosis of the final disposition of the legislation.

CDE's administration of the Amnesty Education Program lead to the conclusion that if CDE is to remain active in the education of immigrants and their families, it must take full advantage of its infra-structure, including internal expertise. Similarly, CDE must deliver organizational support, particularly if CBOs are service providers. For example, one CBO provider observed that the years in which it received larger grant awards to expand its operations "were not necessarily our most effective years." CDE must be prepared to assist providers with the demands of the higher levels of administration and staffing required to operate larger offices, separate satellite offices, inherently less stable service delivery settings, and rigorous fiscal and programmatical accounting.

Similarly, the administrator of any immigrant service program must be prepared and capacitated to deliver technical assistance that reflects the state of the art as defined by both educational research and field experiences; applies in useful ways the lessons learned and resources available; distributes in timely and "user-friendly" ways such information and assistance; and gathers and codifies user comments and refines its technical assistance capabilities. Without such a comprehensive program, administrators will not have sufficient information to accurately judge the quality of their programs, the impact of their programs, nor the true needs of their constituencies.

To ensure these capabilities, future programs should research, develop and, at least on a pilot basis, institute "program improvement grants." Such incentives would be directed toward capacitating selected local providers in specific ways, based upon joint CDE-provider-peer assessments of their organizational and administrative needs.

As it happened, the Amnesty Education Program did not include consistent or system-wide incentives for program operators to access "hard to reach" or "hard to serve" populations. Not reaching these populations is troublesome because these populations likely will need extra service efforts if they are to become productive parts of California's civic and economic life, and their involvement in service programs will be unclear; unclear numbers of participants limit programs, policies and well-informed practices. Without the involvement of these populations, program graduates' characteristics may not (and likely will not) match the characteristics of those who actually require service, or those "hard to serve" individuals who initially enrolled but subsequently dropped-out of the program.

In conclusion, the overwhelming majority of difficulties the program faced in California could have been prevented with small adjustments, more federal planning, more clarity in the federal regulations and guidelines, more coordination between California's Health and Welfare Agency and Department of Education, more sensitivity on the part of Department of Education directors regarding the workload demands, and an earlier effort by CDE in coordinating California's constituencies. These adjustments would have made all the difference.

Recommendations

The recommendations with respect to program and strategic planning are as simple and few as they are compelling.

Recommendation 1: Program planning must be mandated, with a commitment from California's executive branch to both incentives and strictures.

Recommendation 2: The receipt of any immigrant-related resources by any state system of service should be contingent on an organization's knowledge and use of established expertise.

Recommendation 3: The tracking of legislation likely to affect delivery of services to immigrant populations should be coordinated among the legislative sections of all state agencies, with jointly developed bulletins and informational briefings tailored for executive decisions related to coordination of state agencies, departments and services.

Recommendation 4: The state administrator of any immigrant education program must be prepared to deliver comprehensive, empirically-defined technical assistance and administrative support, both pro-actively and in response to field requests.

Recommendation 5: Any future immigrant education program must include well-informed and tailored approaches for serving "hard to reach" and "hard-to-serve" populations.

Recommendation 6: To advance the organizational well-being of providers, all participating organizations should be required to describe how participation in major immigrant education programs will affect their administrative capability, ability to deliver other services, and post-program organizational well-being.

C. Program Oversight And Refinement by CDE and the State Advisory Committee

Context of the Issue

As noted in earlier sections, planning of the Amnesty Education Program was nearly non-existent at the federal and state levels. Consequently, the following discussion of the degree to which CDE was able to provide adequate administrative support and oversight during the program should be understood as following directly out of this lack of planning. This fact is of primary importance, since as critical as the remainder of this report may be, it would be incorrect to interpret these criticisms as somehow an indication that CDE administrators did not adhere to policies or plans, or otherwise were remiss in following standards of service. Quite clearly, the various administrators of the Amnesty Education Program were "going it alone," with next-to-no strategic direction, and little-to-no administrative or technical assistance support from California's Health and Welfare Agency or the Federal Health and Human Services Agency.

Included within the discussion of critical needs are descriptions of how programs set out to serve their clients' needs, including a range of program, service, client characteristics, opinions and recommendations. While all of these characteristics are consequential to a complete understanding of both the program and this evaluation, the recommendations developed within this report are conservative. They only represent issues where there was a high degree of concurrence either within or among constituencies. As it happened, the issues included in what follows were well recognized by nearly all constituencies. That is to say, these issues were clearly and often intensely expressed by all constituencies and were valued as necessary to some degree by all constituencies interviewed. Since these issues found no systematic expression within the Amnesty Education Program — they were addressed to some degree by at least some providers — they should be taken as critical to the success of any future program that educates new immigrants to California.

Critical Issues

The issues identified as critical to the needs of administrators, providers and their clients include:

- Insufficient program monitoring, quality control and performance assessment of the CDE's providers, including insufficient peer review, client-outcome assessment and organizational outcome assessment;

- No post-graduation tracking of education, life-skills, or career changes in students;

- No tracking of institutional changes in provider organizations or the development of local/regional networks of service;

- Minimal education standards, leading to an overly wide range of *de facto* sanctioned "education" providers, programs and curricula, and inadequate identification and dissemination of peer-developed and/or field-tested educational and support-service resources;

- Inconsistent attention to culturally appropriate standards for instruction and support services;

- Insufficient options for accurate testing of students' education needs and education achievements; and

- Insufficient technical assistance related to facilitating student access to education.

Although the intensity of agreement with the need for redress of these issues differed with each Amnesty Education constituent interviewed, none disputed the need for some degree of redress. And, overwhelmingly, the need was seen as a collaborative action, demanding the *sponsorship* of federal and state administrators, but the *active commitment* of all associated with immigrant education and services.

Not to be forgotten is the fact that the Amnesty Education Program was for adult students. And while most of these adults (particularly those with low literacy) enrolled mainly to obtain their INS Certificate of Satisfactory Pursuit, virtually all students interviewed understood the need for and value of learning English[27]. According to instructors and students, once enrolled in the program most students began to realize other advantages and opportunities of education. Besides passing the citizenship exam, in many cases the motivation of those students, was to get a better paying job or to advance in their present job. For those with families, motivations were family-oriented to help their children's future, to help their children do better in school, and/or to provide a better life for themselves or their family and, so, to avoid the "traditional" life they would have had to lead in their native county. Many students, including an increasing number of women, became interested in learning English to better

[27] Students also recognized very well the opportunity that was open to them through the program and frequently expressed their amazement over the "amount of education that the U.S. provides for free."

understand their rights and increase their life-skills development opportunities. Finally, mastering "basic communication" was a motivation common to almost every student.

Students also had more global education goals, either while in or, more typically, after graduating. The most common goals were to receive their GED, to successfully enroll and graduate from vocational training — and so expand their originally limited job opportunities. Higher education and either new or continued professional training was the typical goal for the more literate, educationally-experienced immigrants[28]. Apart from accurate assessment and placement, the factors that influenced students' choice and completion of amnesty classes — and in many cases led to continuing education — included nine motivators:

1) A friendly, non-threatening environment, with caring, culturally sensitive teachers;

2) Some type of child care;

3) Flexible scheduling of courses (weekends, nights);

4) Bilingual, especially bi-cultural, teachers

5) Individualized, "personal" attention and feed-back from instructors;

6) Open class enrollment policy, e.g. being allowed to make up classes, and being allowed to enter a class at any level desired, depending upon student's degree of comfort, regardless of testing results;

7) Small class sizes (no more than 25-30 students);

8) Transportation to and from non-neighborhood class sites; and

9) Instructors' encouragement to continue their education.

Like most students, those attending Amnesty Education Program classes wanted a supportive atmosphere. Instructors typically were seen by students as supportive: "Amnesty teachers are more human;

[28] One student suggested that the state or federal government "could identify those students who wished to continue their education and support or motivate them by offering scholarships" to complete each level of their education.

they try to make you understand; amnesty teachers know how to treat students like humans." Given this support, amnesty students aimed at self-reliance. For many students, education means becoming more "self-reliant": learning is to improve *("aprender es mejorar")*. Taking classes beyond the minimum amnesty certification requirements for some students meant that one can hold one's own...in a challenging situation *("se puede defender")*. As one student described, "The amnesty classes gave me new confidence in my English. Before I got my green card, I felt always like a criminal, afraid to go out because of the police. Now I have better self-esteem and I feel free." Both instructors and students agreed that all these factors were essential for a successful education program for immigrants.

Against this horizon of student perspectives and fragmented policies and practices, the Amnesty Education Program attempted to deal with a variety of distinct issues:

Program Monitoring and Quality Assurance

The majority of those interviewed agreed that some form of quality assurance was necessary and desirable. The major stumbling block to such a system had to do with the intrusiveness — the time, effort and cost necessary — and their suspicion that such a system might not adequately reflect the "special character" of their program. To use an old adage, the quality assurance system "tail" would begin to wag the educational appropriateness "dog."

It is important to recall that the early days of CDE's implementation of the Amnesty Education Program were not the result of any particular strategy. Especially important is the fact that initially the CDE's orientation was toward adult schools. There was no serious consideration of any other providers, so the later — controversial for CDE — addition of CBOs and community colleges worked against the development of unified program goals and expectations. Initially, the CDE preferred that the program funds go directly to California's adult schools, with no inclusion of the community colleges and local CBOs[29]. However, the view that including these other entities would be a needless complication changed fairly

[29] One respondent, however, suggested that this orientation toward adult schools was always unrealistic since adult school standards likely were too stringent, and would effectively preclude immigrants from successful completion of a legalization or any other program; adult school standards and curricula were not sufficiently tailored toward the characteristics and aspirations of immigrant populations; and adult schools have insufficient support services for their general populations, let alone new, significantly illiterate immigrant populations.

quickly into the view that, *with sufficient planning and coordination*, a system that capitalized on the strengths of each of these three service providers would be the most effective. Such a system could provide the greatest coverage of the population, could guarantee best access to appropriate populations and could result in higher enrollments plus higher rates of referral of immigrants to social, health and education services. However, the task of integrating the three competing interests increasingly became a secondary work load for all parties, particularly for CDE and the community college system[30].

Political pressures, time constraints and lack of professional administrative guidelines led to inadequate authority in screening CBOs that had no experience in delivering key program services. Screening of prospective service deliverers was reduced essentially to a "yes or no" decision; only "impossible designs" were rejected; and all those judged even marginally feasible were funded. Even with this limited selection process, some organizations that were not funded contacted their elected officials, who, in turn, exerted political pressures for funding. Administrative and staff support for the selection process was severely limited with seriously insufficient staff, insufficient office space, etc. Moreover, the pressure to simply start the program prior to firm guidelines from the federal government led to programs operating for nearly nine months without payment. Every year, CDE was not even certain of its total allocation until well into the program year. This was particularly difficult for CDE staff during the initial year of program implementation. Given the assurance from the governor's office and HWA that 10 percent of the total allocation was available, CDE over-obligated program funding by 300 percent in the first year! In addition to this confusion over available funding, the short timelines for program funding decisions — the need to obligate funds "yesterday" — were destructive to planned, smooth implementation and oversight of the program. One respondent referred — and others corroborated the concept — to the time given CDE and providers to respond to federal and state directives as almost certainly a "crash and burn" timeline; a timeline designed for failure.

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[30] As of this report, it is fair to say that the general outlook of the amnesty education community is that HWA still believes that California's whole SLIAG allocation was theirs, and that the federal mandate to fund educational programs was, at best, a nuisance, and a misuse of "their" resources. Making this situation even more difficult was the fact that the HWA and the governor's office consistently demanded planning and performance — outcome and cost — information that CDE and local providers were ill-equipped to satisfy.

Coupled with the lack of coordination between service providers and insufficient screening criteria, the program experienced inconsistent perspectives about expectations and the varying needs of service providers. This, arguably, resulted in a lack of technical assistance available to service providers, especially regarding the development of educational goals and processes for meeting the needs of immigrants.

Clearly, this situation did not serve the best interests of the program. These program deficits became increasingly significant due to the varying degrees of sophistication and experience of service providers. Since the program was structured to be "inclusive" — open to all potential service deliverers — CDE administrators had to assume providers' good faith; they could not consistently depend upon the administrative and instructional integrity and competency of service providers[31]. In terms of workload and contractual management, this meant CDE program administrators were forced to deal with a wide variety of competencies and a continuous need for *ad hoc*, special responses to less sophisticated or experienced providers. Unfortunately, given the extremely limited staff resources available to CDE, these special responses were limited.

Consequently, the program had no "real world" performance or graduation standards for students, which led to further discontinuity between graduates' citizenship expectations, their academic achievement, and their "preparedness" demands for the world of work. It was suggested that performance standards and measures — such as those being developed, tested and used by California's Job Training Partnership Act (JTPA) program — could have provided alternatives to traditional testing and graduation standards. In the future, *whatever* performance standards are proposed, the protocol needs to be sensitive to the:

1) Differences in initial "employability" skills of immigrant populations;

2) The kinds and levels of educational efforts corresponding to varying employability needs of students; and

3) The assessment environments corresponding to various locations and characteristics of service providers.

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[31] There was an attempt, however, by state staff to provide some feedback to prospective grantees. At least some of those providers whose applications were initially disapproved were given technical assistance to help make them competitive in the process.

Whatever assessment protocols are developed, they must be relevant to the needs of all service providers, not just CDE. There also needs to be sensitivity to instilling a caring attitude about quality assurance issues in the minds of providers. Too often programs do not take the time to help CBOs make the connection between providing non-threatening, progressive assessments and their value to both their clients and their organizations. Toward this end, the program did develop and support a statewide advisory group. Over time, this group's credibility increasingly lessened the "threat" to service providers of having their programs reviewed and possibly, evaluated, with the result that service providers became more comfortable with program review.

Finally, throughout the Amnesty Education Program, there were inconsistent and cursory performance reviews of grantees by the CDE, and almost no follow up on either students or programs, largely due to the 1.5 percent total budget cap allowed for CDE administration. Peer or self-review by grantees was practically nonexistent, and only occurred informally in the context of local attempts to organize immigrant services and education. All interviewees' suggested that with sufficient technical assistance and discussion, CBOs, community colleges and adult schools could have developed applicable standards *both* for their own performance...*and* for the graduation performance of their students.

In general, the interview data lead to the conclusion that an administrative support system for immigrant education should provide multiple levels of quality review, including: service provider self-review based on more specific standards and criteria than was the case with the existing self/peer review system; annual monitoring by the CDE of *each and every* program provider during the first year of program operation; subsequent monitoring of those providers who were found substantially deficient during the first year; and random, periodic monitoring or spot-checking of all providers that are substantially in compliance with program standards.

Based upon the data, the CDE should provide technical assistance on quality control using a variety of strategies: teleconferences, area meetings, videotaped presentations, and a central database of performance measures used by providers. The state should also encourage local discussion of quality control issues and sharing of information among service providers through area or local network meetings. Providers would be expected to conduct annual self-reviews using empirically-defined criteria adopted by a consortium of representatives from the CDE, service providers and educational

testing/quality assurance experts. While the initial investment in quality assurance would be relatively high, it would not be costly in following years, since unannounced "spot-checking" *through random sampling* could help to keep costs low and performance high.

Post-graduation Tracking of Students

One of the least satisfying aspects of both the Amnesty Education Program and this evaluation was the inability to judge the impact of the program by monitoring its effect on graduates' lives. Whether or not it was a federal perspective, it certainly was part of California's perspective that the value of the program was to enable graduates to participate in California's economic and political life. The acquisition of a "green card" was simply meant to be a pre-condition for inclusion, according to California's immigration educators.

As it is, except for their most successful graduates, neither CDE nor most local providers knew the locations of their graduates, let alone their current status. Apart from the fact that this situation works against forming any empirically-based policy in California, the availability of only the very highest functioning graduates is problematical. Not only do these graduates misrepresent the typical graduate (this, providers understand and readily admit), but their inclusion in program impact surveys tends to confuse the debate on immigrants' education needs. First, those non-supportive or suspicious of immigrant education can use the lack of representative data on graduates as a deliberate attempt by immigration advocates to misrepresent the characteristics of California's immigrant population, so as to buttress their own positions on immigration. Second, given the relatively small number of graduates who were available to this evaluation, their serving as "standards" for the evaluation runs the risk of confusing their individual needs with immigrants in general. Thus, the question of the representativeness of this sample — even to characterize higher functioning students — must remain problematical.

Clearly, any future immigrant education program must include post-graduation tracking. Whether truly longitudinal in scope — using many years of follow-up or tracking through well-agreed, progressive benchmarks until "completion" — or merely a more limited-term follow-up, client tracking is necessary for program refinement and policy reformulation. Without it, any amnesty education program (or any future program) will suffer from not accurately representing itself to federal and other California agencies, and from not truly assessing the quality, scope and appropriateness of the services for which it contracted.

Institutional Changes in Provider Organizations or Networks

Except for serious project-specific, compliance issues — essentially audits — CDE had no capacity to track the impact of the Amnesty Education Program on provider organizations. Similarly, few providers or program administrators expressed confidence that they were aware of California's field-based, "state-of-the-art" with respect to immigrant education. Even with the progressive unfolding of a service network in San Diego County, very few interviewees were aware of particulars, notably, the critical matter of how such a network could have been initiated, and how this model could be replicated within their area.

As with student impact analysis, such information would be important for refining policies and practices and, equally important, would set the stage for the Amnesty Education Program's legacy: the redirection of local efforts to assist immigrants according to local needs and resources. Whether as a function of a more intensive performance review or as a categorical function, it is critical to programs like this one that judgments of its value and need include the extent to which participation in the program enhanced providers' ability to better serve clients in the future. Certainly, for some participating CBOs, the program's legacy was mixed, no matter the quality or the beneficial impact of their services.

Education Requirement and Curriculum Content

There was concurrence by the service providers interviewed that the 40-hour educational requirement was completely inadequate for meeting students' educational or job-related needs. They were clear that 40 hours was barely enough for students to learn even the most basic survival skills or to convince students of the value of continuing their education, post-amnesty. The number of education hours that administrators and teachers recommended as a minimum certificate requirement varied from 100 to 1,000 hours. The 40 hours allocated to the Amnesty Education Program did not correspond to anything in particular, and were nowhere near the basic education hours sufficient for students to conform to California's mean education test performance standards for minimum literacy — estimated as requiring 750 to 1,000 hours of classroom time.

At the lower end, the education vision for student achievement tended to be job and life-skills related, where the student had sufficient language skills to successfully access jobs and services. Once successfully accessed, these students would follow the histori-

cal pattern of previous American immigrants, and become increasingly adept, more productive and more of an integral part of their communities. At the higher end of the range, the education vision was the traditional K-12 expectation, where a normal distribution of education aspirations would take hold with many students gaining GEDs, fewer students graduating from high school and still fewer going on to college, but all being able to become employed sufficiently to support themselves and their families.

Specifically, the providers interviewed were more in agreement over the likely outcomes for various levels of education:

- *40 hours* would provide students with routine communications skills and some survival skills.

- *500 hours* would provide students with ESL and job training courses; would ensure that all students with an 8th-grade diploma from their native country would pass the GED; and would provide students with enough English to understand radio announcements, comprehend an English-language newspaper including classified ads, and handle a job interview.

- *1,000-3,000 hours* would empower immigrants to become active and responsible citizens and participants in this society. For example, 1,000 hours would enable students to:
  - Use basic English to help their children with homework, read daily American newspapers, comprehend the majority of government documents, understand daily and emergency radio/TV newscasts;
  - Appreciate government (know constitutional rights and responsibilities, know legal rights and responsibilities);
  - Obtain a significant education (where a majority of students would pass the GED); and
  - Manipulate a computer (use a word-processing program, manage a simple database).

In line with the issues of education standards, service providers (administrators and instructors), as well as Department of Education staff, had several points of view and suggestions about developing appropriate curricula for immigrant students. First, state-sanctioned, model curriculum standards should be articulated for different levels of student learning needs. While traditional education courses (math, civics, history, science, etc.) should be taught, all teaching

should be conducted in the context of students' cultural experiences. Without this coupling of subject matter to teaching style and context, an immigrant education program might inadvertently discourage students, who would then become less likely to take advantage of education or training programs in the future.

Secondly, there should be a variety of model curriculum standards — corresponding to the needs of different immigrant populations. Having multiple curriculum standards would help to ensure respect for immigrants' native languages, value systems, backgrounds, cultural contexts and current living standards. On the other hand, model curriculum standards should not be allowed to dismiss traditional educational standards in favor of reiteration of immigrant students' *past* cultural, geographical, educational, political, social and economic contexts. The education and general service orientation should always be on the students' new residential and citizenship environment: the United States. Curricula standards could and likely should be developed by a team of CDE staff and local service providers, that could also be responsible for selecting locally developed curricula, pre-assessment tests and performance measures.

Program curriculum should focus on helping immigrant adults with their special language and skills learning needs rather than on providing them merely with a minimum education vehicle for legalization. In effect, if the focus of immigration programs is education, then the education perspective must be taken seriously. In a truly educational context, teachers should help students to become responsible for their learning and for functioning as "owners of their education." Most often, this requires assertiveness training and the promotion of self-esteem, two characteristics that often are absent in new immigrants, especially for women.

Service providers also expressed that an essential curriculum for immigrants should address several critical-content areas: basic "survival" English; ESL integrated with civics, history, government, U.S. culture and citizenship; basic life skills[32], employment preparation[33], and GED or high school diploma preparation. They also felt that

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[32] *Life skills* includes such things as using the phone, buying groceries, shopping, understanding verbal directions, understanding job titles, naming family members, describing illness to health providers.

[33] *Employment preparation* includes such things as drafting, sheetmetal, custodial services, electronics, printing/graphics, word processing, bookkeeping/accounting, machine operation, landscaping, childcare, food services, equipment repair.

curricula should include an increased number of practical courses and topics: substance-abuse prevention and treatment, tobacco use and health, the environment, gardening, sewing, income tax preparation, handling domestic violence and sexual harassment, accessing public safety and social service agencies, pregnancy and women's health issues, parenting and childbirth, employment and non-traditional roles for women, and self-esteem training.

Instructors suggested that the curriculum needs to include core requirements, vocabulary and basic skills, but that they need to have the flexibility to adjust the curriculum to their students' experiences and to community needs. The role favored for the Department of Education should be to provide curriculum guidelines, not in specifics, because "the needs and skills of rural students are different from those in urban areas." In short, curriculum should recognize that while some students might want to pursue higher education, others might want job training, or only basic survival skills.

Based on the reflections of many instructors, the best *teaching style* to help immigrant students in their adopted country involves several features with *less* lecturing to passive, obedient students; *more* emphasis on working cooperatively in teams or groups; *more* emphasis on development of self-esteem; and *more* emphasis on the positive aspects of cultural diversity, including promoting anti-bias attitudes, and celebrating the contributions of immigrant populations.

To these ends, many teachers and instructors attempted to teach English *in* English using, for instance, Spanish only to explain important concepts or issues, or during the first week or so to help orient students. Progressively, English was used with increasing frequency. Not surprisingly, ESL students with more English facility were presented with more English instruction and more expectations for responding in English. And for intermediate and advanced ESL students, classes were conducted exclusively in English.

Regarding the level of English usage, however, there was polarization of opinions largely depending on the type of service provider being interviewed. Some instructors at community colleges and adult schools believed that native-language English instruction was, to some extent, self-contradictory, and felt that teaching should be exclusively in English. Conversely, a substantial number of instructors at CBOs felt that teaching should be mainly in Spanish for preliterate students, citing academic and field-based assertions that a second language is most effectively gained by reference to a

student's knowledge of a first language. Without "first language" literacy, "second language" literacy is problematical.

Specific instructional strategies or learning arrangements mentioned by teachers and instructors as working best with predominantly Hispanic/Latino students were given as follows in descending order of frequency mentioned:

1) Conversational opportunities provided through rote recital, role plays, mini dramas;

2) Working in small groups or pairs;

3) Peer tutoring/coaching;

4) Heterogenous grouping of students at different ESL/skill levels;

5) Use of invited speakers on "relevant topics";

6) Use of current events, social issues, and real-life situations to teach English (for classroom lessons);

7) Individualized instruction;

8) Use of Total Physical Response (TPR) — a kinesthetic method for learning English;

9) Combining amnesty students with regular ESL students (in community colleges);

10) Independent work;

11) Videotaping individual performance for personal study;

12) Focus on providing positive (affective) experiences;

13) Ability grouping with open membership;

14) Altering pace of instruction for less literate students;

15) Field trips; and

16) Keeping the library open at night, hiring a bilingual librarian, purchasing Spanish language texts.

Examples of other effective strategies included the use of both incentives and negative reinforcements to encourage students to speak only English during class time. For example, if students spoke their native languages during class, they were required to contribute something to a "pot" which was raffled at the end of the week. In addition, the amount and difficulty of schoolwork was gradually increased as students gained in English facility. For example, low English fluency students might receive more visual aids, games and speaking assignments before being introduced to a textbook.

Often, instructional strategies were employed that made use of students' best skills. For instance, several providers noted that their Latino students tended to have lower reading and writing skills but higher verbal skills, whereas their Asian students tended to have higher reading and writing skills but lower verbal skills. Consequently, techniques such as peer tutoring, role playing and small group interaction were frequently used for Latino students; while rote recital and independent work were used for Asian students. The instructional materials that worked best with immigrant students varied by cultural/ethnic characteristics, but generally included dual translated materials, such as bilingual newsletters, materials that addressed subjects or issues relevant to students' lives and experiences, computer-based[34] learning programs (e.g. grammar, vocabulary), audiocassette stories and visual props.

Culturally-appropriate Standards and Instructor Selection and Preparation

The best *staff* configuration for teaching immigrant populations was seen by providers as including cultural and ethnic diversity of staff, competence in ESL pedagogy, fluency in the languages of the students, and sensitivity in balancing students' native cultures and attitudes with the need to successfully contend with America's current culture. For present purposes, these characteristics reduce down to cultural sensitivity and qualified instructors.

With respect to cultural sensitivity, instructors cautioned that "Spanish-speaking people — the overwhelming preponderance of California's immigrants — are a *"face culture,"* and that "if they feel humiliated, they won't come back." They emphasized, therefore, that equally or more important than ESL qualifications, teachers and instructors must be sensitive to students' cultural values and customs (and even holidays), as well as their learning styles. They

[34] Instructors reported that computer training was very popular with all immigrant students.

maintained that without such culturally sensitive teachers and instructors, students would otherwise drop out. Instructors' sensitivity to protect the ego of students also applies to the difficulty of their schoolwork; for example, it was suggested that instructors *gradually* increase the amount and difficulty of schoolwork according to students' levels of English fluency.

As an indication of the importance of cultural sensitivity, "natural" teachers were often preferred over credentialed teachers. In particular, many CBOs hired instructors who were not certified but were selected instead on the basis of being bilingual, having similar cultural backgrounds to their students, and having demonstrated knowledge, sensitivity, and ability to interact effectively with the students. Where possible, "natural" teachers were also selected as having prior teaching experience in or a credential from their native country. Moreover, to ensure teacher sensitivity, for example, some providers gave new instructors an orientation packet that familiarized them with the program and the kind of teaching expected of them. In addition, these providers held regular training seminars for instructors every two months. Some CBOs had teacher-mentoring programs modelled after school district teacher training/staff development programs, which involved more experienced teachers conducting staff development seminars and conferences for less experienced teachers.

On the topic of instructors' qualifications, providers felt that any immigrant education program *must* focus on mastery of English, in order for students to break the negative reinforcing cycles promoted by limited literacy skills and, subsequently, to successfully access education and economic opportunities. It was suggested by Department of Education staff and a number of service providers, that all program sites should be required to have certified ESL instructors and bilingual counselors *who actually deliver services, and are not simply "on paper" staff*. While most adult schools required their instructors to have a California credential (in elementary, secondary or adult education), whenever possible, they preferred hiring instructors who had practical cultural awareness, experiences and backgrounds similar to students.

Interesting here is the fact that adult schools that used only certified instructors encountered great difficulty finding adequate numbers of instructors and, consequently, had to have large class sizes with less opportunities for personal contact between instructors and students. Likewise, a number of community colleges also indicated that their amnesty program got so large that administrators, instruc-

tors, and students lost personal contact with each other. There were so many part-time and hourly-employed instructors that administrators could not interact sufficiently to ensure instructors' familiarity with the program, curriculum and students' needs. In short, instructors could not interact sufficiently to get to know their students and, consequently, students were often less familiar (and less comfortable) with instructors. Undoubtedly therefore, trying to serve large numbers of immigrants using *only* certified instructors tended to distance students, teachers and administrators from each other and, thereby, reduce the effectiveness of the entire program.

Student Pre-testing, Placement, and Assessment

Many CBOs expressed the need to understand the importance of pre-assessment of learners' needs, i.e. oral expression, reading/writing skills and educational goals as a basis for placement in program classes. These discussions suggest the need for both formal assessment (standardized pre/post tests) and informal assessment (observation, performance demonstration) to help students "crystalize" their goals and as a basis for monitoring students' progress. The need for a better understanding of the options and value of assessments is more important for the less sophisticated service providers; several CBO instructors interviewed believed that formal testing is intrusive and asserted that informal observation is all that is ever needed.

The most effective systems of student monitoring and assessment found during the interviews used screening and placement tests, i.e. oral interviews, short reading tests, brief writing samples; progress tests, i.e. reading, listening; and language and subject-matter proficiency tests. Testing for language and skill proficiency included paper and pencil tests, oral interviews, developing a job plan, and outcomes tracking. The INS oral examination was seen as one of the best models for conducting an oral interview, but only if it was administered correctly, i.e. using the same number and kinds of questions given to all students, with no arbitrariness. Types of subject-matter proficiency tests (history, government, etc.) used by providers included those produced by the INS, Educational Testing Service (ETS), and Comprehensive Adult School Assessment System (CASAS). CASAS subject-matter tests were considered user-friendly and reliable for getting test results back quickly.

Tests used by service providers interviewed to *pre-assess* students' literacy skills (listening, speaking, writing, reading) and to place them in appropriate courses included the provider's oral test or

interview (conducted in Spanish or English), written exam and performance test[35]; and IRCA/SLIAG pre-enrollment appraisal assessments.

Although CASAS was the most widely used test, most providers used multiple types of pre-assessments to screen and place their students. As explanation, providers indicated that current paper and pencil (written) forms of assessment cannot always measure a student's language gains. They recommended using oral assessments and teacher judgments as well. They felt that students should be assessed on their basic literacy skills, communication competencies, and task completion skills (e.g. going to a doctor or the Department of Motor Vehicles).

Teachers' judgments were often relied upon to supplement and validate CASAS test results. Some providers felt that using the CASAS test was valid only as long as its administration was supervised. If the results showed negative post-test growth, then other explanations were sought — usually through an alternative assessment — before accepting the CASAS results. Most providers, however, felt that while the CASAS test was appropriate for literate students, it was inappropriate and even "culturally biased" for pre-assessing low functioning or pre-literate students, and that it was inadequate for measuring students' ability to creatively put together phrases in English. They also expressed that there was very little relationship between instruction and CASAS test results. One felt that the CASAS exam was useful for showing the progress of all students overall, but was not valid for individual student assessment. Furthermore, there was complaint that the CASAS exam may actually inhibit and underestimate student performance because it makes students unfamiliar with the test protocol or who score low, feel incompetent and, so, not perform optimally.

Some instructors recommended placing students at a specific ESL level (beginning, intermediate, or advanced) that could be adjusted after the first few days of class if appropriate, and that students should be able to move from one level to another at any time (open membership) as soon as they could satisfy a level's requirements, or when they felt they wanted. Other instructors suggested that students should also be allowed to place themselves (those allowed to do so would often "under-place" themselves) and then move up to higher levels when they felt more able and confident. Finally, a few

[35] An example *performance test* might be as follows: the teacher pretends to be a bus driver; students have to ask for information or tickets in English.

service providers gave students who wished to skip the 40-hour requirement the option of taking a "videotaped (performance) exam." If students passed, they were allowed to skip a portion (e.g. civics) of the INS citizenship exam.

Based upon the interview data, any system for assessing students' (and service providers') performance should consider, did students complete their training program satisfactorily, did students get a job, and did students keep their job?

While measuring the first outcome is relatively straightforward, post-graduation tracking is not. The CDE would be in the best position to develop a centralized strategy for tracking students, perhaps through cooperative arrangements with postsecondary institutions and the workplace. A student monitoring and tracking system might include sampling strategies to collect progress and follow-up data on students, incentives for graduated students and employers to respond to employment queries, standardized data capture and reporting forms or software, special data runs from California's Employment Development Department, etc.

Providing or Facilitating Student Access to Education

Without exception, those interviewed identified support services as one of the most important features of any immigrant education program. During the Amnesty Education Program in California, this critical feature was absent both at the planning and refinement stages. There was little-to-no attention given to the issue of "hard-to-reach" or "hard-to-serve" populations and no consideration of possible state incentives in support of such service.

In the minds of California's providers, programs that included support services had been and would be more effective in assisting immigrants overcome barriers to participation in their programs and other educational programs. This translates to providing communication of available services, convenient location and scheduling of classes, counseling and referral services, child care and transportation. Service providers indicated a limited set of strategies and services that had been and would continue to be most effective in recruiting and retaining students in their education programs.

First, there must be effective communication with immigrants explaining what services are available. Providing immigrants with a good program introduction or orientation is essential to recruiting students on their first visit. It was suggested that an effective intro-

duction should include: showing a motivational video, pairing students and having them share their educational goals, and explaining all courses and services available in the program. It was also suggested that the Department of Education should provide a brochure on how to access various social services, and explain how the American school system works. This brochure could be designed for students at various levels of English fluency and distributed to all service providers. In addition, an 800 number should be provided with a person on the other end to give information on services offered by local agencies. Merely providing an 800 number with an answering machine was not recommended, since this automated approach is typically outside many students' experience: "They don't feel comfortable talking to a machine; they'd just hang up."

Finally, it was suggested that effective communications to inform and recruit students should be done *in their own languages*. Effective *ways* of promoting awareness could include: posting flyers; using immigrant-language radio stations and talk shows; writing articles about education programs for local immigrant-language newspapers; providing a weekly column to explain the latest immigration laws and policies; and holding health and education fairs at different locations.

Of critical importance was classroom accessibility: holding classes in locations close to students' residences and easily accessible on foot. For example, classes could be held in churches, meeting halls, recreation centers, senior citizen centers or other neighborhood gathering places. Several CBOs and adult schools held classes at students' work sites (e.g. hotel/factory sites, a plant nursery) when owners provided space and allowed workers time to attend classes.

An exemplary work-site classroom arrangement was described by one provider as follows: there were qualified teachers and validated course materials; courses were held for an hour twice per week for 10 to 12 weeks; course schedules were flexible with class times or days changed to fit the students' work-related needs; and each work-site had a contact person whom the service provider could call if any problems arose with the classroom, instructor, or the program. Other proposed/implemented ways to effectively provide access to educational services included offering students convenient class schedules to accommodate their work needs, including providing morning, afternoon, evening and weekend classes.

Offering students additional services besides basic education was also seen as essential. These services should include education counseling and referral to other qualified providers, jobs counseling and

preparation courses, health screening (medical, dental) and referral, and legal counseling and referral. Establishing childcare services was uniquely important to student mothers and those without available family support systems. Using a mobile home as a daycare center to serve students working on farms and ranches also proved effective. Offering parents a modest childcare allowance that would allow them to choose their caregiver and also provide income for other community members was also suggested. Providing vans or low cost transportation to get students to class, issuing bus vouchers or arranging bus discounts, and location of service sites along bus lines should all be explored as ways of increasing attendance by students.

Summary

All educational administrators and program providers interviewed were cordial, cooperative and quite expressive concerning the strengths and weaknesses of the Amnesty Education Program. Moreover, each interviewee offered a similar and important sentiment about the program: "Given the lack of direction from the federal authorities, given the intense demand and need for services, given the program's time constraints, and the complexity of the service delivery situation, it's amazing that the program accomplished as much as it did." The evaluators were struck by a point made in different ways by the interviewees: that with a reasonable amount of lead time, and clarity on the initial federal budget allocation, many difficulties would have been minimized or even eliminated. Overall, those interviewed were uniformly supportive of the continuation and expansion of the program, even with all the structural and operational barriers.

Another way of understanding the California SLIAG experience is to contrast this report's findings with the findings of the most complete assessment found during this study's review of the literature. A 1992 New York evaluation study entitled "From Needs Assessment to Program Planning - Vols. I-IV," provides a comprehensive look at the amnesty education program of New York State. This program served, in the words of the report, as a "model of collaborative work between provider agencies and the State Education Department, leading to the common goal of enhanced services for the new immigrants of New York State."

The main purpose of the New York study was to provide a needs assessment framework of amnesty immigrants in the state. It constructed a picture of the population in terms of demographic characteristics, educational and occupational backgrounds, family

situations and educational and work aspirations. The assessment of its success is summed up in the report as follows:

> "The report demonstrates the vitality of the immigrants it surveys, their resourcefulness in seeking employment, and their willingness to take advantage of educational opportunities. Many have already made a significant contribution to the quality of everyday life in their communities."

As with California, the delivery of education and vocational training to the immigrants of New York was "clearly perceived (by immigrants) as a vital means to realize economic objectives to reunite their families and to successfully accommodate themselves to the American environment." Nearly all of New York's new immigrants work or have worked in the U.S., have limited income and want to improve their knowledge of English. They understand the connection between education and improved employment opportunities, and are highly motivated to study and enhance their occupational skills. There is a special interest among amnesty immigrants in New York in receiving vocational instruction. This would allow many of them to become recertified in the occupation they pursued in their home country and, so, practice a marketable skill that would enable them to escape their current low-skilled, low paying jobs. To facilitate this, immigrants have clear and serious needs for career and labor market counseling.

The primary reason for immigrants' enrollment in amnesty education classes in New York was to learn or improve their English. In California, by contrast, this evaluation found that the primary reason for immigrants' enrollment was to pass the citizenship class, on their way toward legalization. Another distinction between the two states' experiences is the level of education and work experience. In New York, students typically had relatively high levels of education and work experience. This was not the case in California. Furthermore, the New York participants possessed considerable formal education and some secondary education. Nearly all students had worked in the U.S., and a large proportion of them possessed occupational training and experience relevant to the U.S. workplace, quite unlike California's immigrants. Finally, unlike their California counterparts, nearly half of New York's amnesty students had taken formal education classes on their own prior to coming to SLIAG.

The New York study served a very important purpose as the first "needs assessment" study on the topic of immigrants. This study,

consequently, serves as a model for future needs assessment studies and as a source of comparison for other amnesty programs. Two recommendations made in the study that were similar to the Rand Corporation's study are that amnesty immigrants increasingly express the desire to continue their education, so there is a definite need to find resources to keep these immigrants active learners; and in planning instructional programs to serve amnesty immigrants, planners and policy makers need to tailor programs to the educational backgrounds of amnesty students.

Based on the interview data in California, any productive immigrant education program must have clearly defined program goals and roles for various provider agencies — H&W, CDE, INS — so they are coordinated and cooperative, not competitive. Given the volatility of immigrant issues, such a program may initially require a neutral party to facilitate goal setting and planning between the three agencies.

A productive federal immigration education program must include a more realistic, and empirically-founded education component. The arbitrary stipulation of hours for education — following non-immigrant, non-educators' views of how much time it *should* take — will not assist America's literacy level, nor will it assist the vast majority of immigrants to fully participate in America's civic and economic life. In the words of one provider, the INS requirement for 40 hours of education "confused many immigrants;" they felt that it was not important for them to attend class, even though the law provided the funds.

A productive program must have state-sanctioned, model curriculum standards articulated for different levels of students' learning needs. Traditional education courses (math, civics, history, science, etc.) must be taught. However, all teaching should be conducted in the context of students' cultural experiences. Without this coupling of subject matter to teaching style, an immigrant education program would inadvertently discourage students, who would then become less likely to take advantage of future education and training programs. Very likely, there will have to be a variety of model curriculum standards — corresponding to different major immigrant population groups — *and they must be developed very carefully*. On one hand, there likely will have to be multiple curriculum standards; not one, rigid approach applied without respect to the immigrants' native languages, value systems, backgrounds, cultural contexts, or current living standards. On the other hand, model curriculum standards must not be allowed to dismiss traditional educational

standards in favor of reiteration of immigrant students' *past* cultural, geographical, educational, political, social and economic contexts. These standards should be developed by a team of CDE staff and local service providers, who would also be responsible for selecting and developing curricula, matched tests and performance measures.

As is the case with native populations, the most productive service system includes support services that help participants overcome barriers to participation. For immigrant education, this translates to flexible scheduling of services and classes (mornings, afternoons, evenings, week-ends) to meet students' work, child care, and mobility (drop-in/out) needs. Transportation access, vouchers, and multiple neighborhood service sites should be explored as ways of increasing attendance.

Any immigrant education program *must* focus on mastery of English for students to break the reinforcing cycles promoted by poor language skills and poor access to education and economic opportunities. All program sites should be required to have certified ESL instructors and bilingual counselors; and *staff who actually deliver services, not "on paper" staff*[36].

A productive immigrant education program should focus on lifeskills courses/topics, stressing information that is needed by all U.S. residents if they are to be a healthy, productive part of their communities. These topics include substance abuse, tobacco use and health, the environment, gardening, sewing, income tax preparation, handling domestic violence and sexual harassment, accessing public safety and social service agencies, pregnancy and women's health issues, employment and non-traditional roles for women, and self-esteem training.

The most effective immigrant education system would involve a coordinated, cooperative structure. There would be networking — cooperative support — strategies between state program providers and local service providers. There would be comparable levels of cooperation and coordination among local providers, *all three types of providers* — CBOs, adult schools, and community colleges. The most effective system would be the most comprehensive and coordinated system, with students having the opportunity to choose

[36] There were frequent criticisms by both CBOs and adult schools that some CBOs used "paper" staff to justify their organizational competency, while classroom services were delivered by less skilled, non-certificated educators.

their entry point into either adult school, CBO or community college. Each entry point provider must be equipped to conduct *or arrange for tailored* outreach to particular immigrant communities. Outreach services should be conducted by the most effective provider *for that service*; a model system should not demand that a full range of services be provided by all service providers.

In a model system, students should have confidence that each entry point corresponds to well-developed, consistently applied standards that are uniformly monitored. Students should be assured that whatever "point of entry" they access, the program will meet clearly defined criteria and competence requirements through participation in a local cooperative network. In addition to certified curricula, standardized assessment protocols and sanctioned education materials, the comparability of programs should be supported by having all instructors paid at the same rate, regardless of whether they serve with CBOs, adult schools or community colleges.

On the topic of interagency cooperation and coordination — and possibly shared resource development and use — there have been several cases where CBOs have found it problematic to seek SLIAG education funding. According to the "SLIAG Advocacy Packet: A Guide for CBOs" by the National Council of La Raza (1989), some states have been reluctant to contract out to CBOs, partly because the concept is unfamiliar and partly because the CBOs have had little opportunity to enhance and expand state education structures. Interested CBOs with experience and a tradition of service have instead often been asked to refer their clients to state education institutions, such as adult schools and community colleges.

Other problems that have faced CBOs with respect to program participation center on the confusion as to who is in charge of SLIAG education funds and the lack of unified leadership within California. CBOs have complained of frequent changes in state regulations, lack of clarity as to which state guidelines apply to SLIAG-funded programs, and unnecessarily cumbersome state program reporting requirements. Another significant problem has been the lack of timely attention by the state given to CBOs who have wanted to offer ESL/civics classes to their eligible legalized alien clients. Since SLIAG has been only one of many state-funded programs, reimbursement to CBOs that have started classes and hired staff is particularly slow, adversely affecting CBOs.

Regarding testing and assessment, a model system should have multiple assessment protocol. Well-founded student pre-service

testing and assessment for placement must be available and consistently applied, as should other performance measures for assessing student progress and outcomes, using both formal and informal assessments to monitor learner progress and make adjustments. There must be quality assurance criteria and procedures involving state monitoring and provider self-monitoring, and there must be criteria, processes and effective methods for below-standards providers to obtain needed accreditation or certification, e.g. the federal Adult Basic Education system had effective staff development, an adequate variety of curriculum programs and adequate student assessment. What matters most is that the service provider — whether CBO, adult school or community college — has appropriate experience and support to do the job. There must be staff development opportunities for all instructors, coupled with certification procedures for staff. This assessment is particularly important with respect to ESL certification, and ethnic/cultural competency and sensitivity. Each provider must have the fiscal management expertise to track program costs, and capability to report program characteristics, student outcomes and program costs. This system of managing program information should be standardized statewide, and with technical assistance and corrective action available to providers.

Whatever model system is developed conceptually, it must be capable of being accomplished in the real world, with sufficient resources. The development of "adequate" resources must take into account the following:

1) Current and likely future levels of immigrants, including likely residential settings, locations and support systems;

2) Opportunity and real costs associated with *not* meeting immigrant populations' educational and training needs;

3) Need for "one time" development costs, including program monitoring, evaluation, and technical assistance;

4) Need to balance immigrant education versus all other health and well-being needs of immigrant families; and

5) Disproportionate fiscal impact of major programs which can lead to agencies over-extending themselves and then failing in response to "boom or bust" cycles.

Currently, and for the foreseeable future, funding for adult education is inadequate and not accessible to all providers. Providers need support in locating people, space and funding. Alternative sources of non-SLIAG funding is needed, as, quite clearly for California's providers, the primary challenge of the future will be to meet the educational needs of the SLIAG population *without* the aid of SLIAG funds. Effective transitioning and innovative programming is necessary both for obvious reasons, and to ease the loss of SLIAG funds. Adult education, in terms of English language instruction, high-school equivalency classes, vocational training and workshops on effective planning are, and will continue to be, heavily demanded by new immigrants. Further, without adult education, the education of immigrant children is threatened, since greater educational opportunities for parents typically translates into more successful schooling for children.

The data gathered further argue that the historical need for support services for immigrant populations will continue, and with need for coordinated delivery of education, health and social services provided by those familiar with language and culture of immigrant children. According to a school board member:

> "It is those nurses, counselors and school psychologists who serve as the bridge between schools and outside institutions such as other government agencies, community organizations and medical schools."

Following on this fact, the California Department of Education has expressed an historical and institutionalized mission to:

> "lead, assist and motivate Californians in providing high-quality programs that are efficient and equitable; that prepare students for employment and citizenship; and that promote students' intellectual, ethical, cultural, emotional and physical growth."

With this mission in mind, CDE, HWA, the governor's office and public and private agencies must continue their efforts to serve new immigrants — and thereby serve the well-being of the state — but serve them as part of a service team. However, before tackling that issue, an increasing public perception must be eradicated: that these new immigrants are not residents, are not here to stay, are second class citizens whose needs are not related to longer-term residents. Without a recognition of the fact that immigrants *are and will continue to be residents*, there can be no effective identification of the

well-being of California with the well-being of *all* of its residents. When the fact of new immigrants' continued residency is accepted, only then will it be feasible to design and deliver "client centered," multi-service programs, responding to the real needs of new immigrants, and directed toward their civic, intellectual, ethical, cultural, emotional and physical well-being.

Future programs will need flexibility to use immigrant-directed funds due to the changing characteristics of new immigrants: their ages, countries or origin, urban or rural up-bringing, family status and aspirations. Economic aspirations become crucial in light of California's current and likely economic down-turn. Categorical funds should be made available to provide instruction, student transportation (notably for sparsely-populated areas), childcare facilities, administrative services, space and equipment rental, and staff and staff development.

Recommendations

The recommendations of this evaluation with respect to adequate program management by CDE include:

Recommendation 1: *Any program designed to serve immigrants' education needs must include standardized programmatic monitoring, quality control and performance assessment of service providers.*

Recommendation 2: *Educational programs designed to serve general versus "categorical" immigrant populations must include post-graduation or post-completion-of-service tracking of students' education, life-skills or career changes.*

Recommendation 3: *Education programs designed to deliver service through independent grantees — providers — must include end-of-program assessments of the organizational impact of providers' participation in the education program.*

Recommendation 4: *Empirically-based educational standards, tailored to the particular needs of distinct immigrant populations, must be the foundation of any program to educate immigrants in California.*

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Recommendation 5: ***Instructors taking part in immigrant education programs must reflect an effective match with the cultural needs of students, curricula and the instructional setting.***

Recommendation 6: ***Education instruction for immigrants must be matched with options for accurate testing of both students' needs and their educational achievement.***

Recommendation 7: ***Programs, education or otherwise, directed toward non-assimilated populations such as recent immigrants, must include strategies and services for increasing the access of clients to services.***

III. List of Recommendations

The following is a unified listing of all recommendations contained within the body of this evaluation report. In addition to the specific recommendations, the evaluators would like to offer one general finding, again based *solely* on information gathered during the interviews. All too often in federally-funded but state-administered programs, the rush to get funds obligated and expended not only weakened the program and delayed its successes, but also caused unnecessary difficulties — not the least of which were administrative and programmatic inefficiencies, staff and provider frustration, delays and less-than-optimum implementation of a statewide program, resulting in a chain reaction of failed expectations and misunderstandings among constituencies.

The recommendations with respect to effective **federal program planning, oversight and administration** include:

Recommendation 1: Federal program planning must include authentic opportunities for consistent participation from all affected constituencies in planning any program that intends to serve immigrants.

Recommendation 2: Federal programs of the magnitude of SLIAG must be secure in regulation prior to states' ability to implement them.

Recommendation 3: A program of empirically-based, "state-of-the-art" technical assistance must be part of any federal initiative aimed at identifying and realizing the federal government's responsibility to states for its immigration policies and practices.

Recommendation 4: A federally administered program such as SLIAG must be capitalized and categorically devoted to SLIAG during its lifetime. Any future federal program for service to immigrants must be free from gross yearly fluctuations and delays in payments or from demands from competing interests or programs.

Recommendation 5: Any program of the magnitude and complexity of the Amnesty Education Program must include provision for performance review and, preferably, options for information development directed toward program refinement and replication.

The recommendations with respect to **state program pre-planning and coordination** include:

Recommendation 1: Program planning must be mandated, with a commitment from California's executive branch to both incentives and strictures.

Recommendation 2: The receipt of any immigrant-related resources by any system of service under state auspices should be contingent upon the documentation of, refinement and use of established expertise.

Recommendation 3: The tracking of legislation likely to affect services delivery to immigrant populations should be coordinated among the legislative sections of all state agencies, with jointly developed bulletins and informational briefings tailored for executive decisions related to coordination of state agencies, departments and services.

Recommendation 4: The state administrator of any immigrant education program must be prepared to deliver comprehensive, empirically-defined technical assistance and administrative support, both pro-actively and in response to requests from the field.

Recommendation 5: Any future immigrant education program must include well-informed and tailored approaches for serving "hard-to-reach" and "hard-to-serve" populations.

Recommendation 6: To advance the organizational well-being of providers, all participating organizations should be required to describe how participation in major immigrant education programs will affect their administrative capability, ability to deliver other services, and post-program organizational well-being.

The recommendations with respect to adequate **program management by CDE and the Amnesty Education Program's Statewide Advisory Committee** include:

Recommendation 1: Any program designed to serve immigrants' education needs must include standardized programmatic monitoring, quality control and performance assessment of service providers.

Recommendation 2: Education programs designed to serve general versus "categorical" immigrant populations must include post-graduation or post-completion-of-service tracking of students' education, life-skills or career changes.

Recommendation 3: Education programs designed to deliver service through independent grantees — providers — must include end-of-program assessments of the organizational impact of providers' participation in the education program.

Recommendation 4: Empirically-based education standards, tailored to the particular needs of distinct immigrant populations, must be the foundation of any program to educate immigrants in California.

Recommendation 5: Instructors taking part in immigrant education programs must reflect an effective match with the cultural needs of students, curricula and the instructional setting.

Recommendation 6: Education instruction for immigrants must be matched with options for accurate testing of both students' needs and their education achievement.

Recommendation 7: Programs, education or otherwise, directed toward non-assimilated populations such as recent immigrants, must include strategies and services for increasing the access of clients to services.

Appendix A: Key Constituencies Interviewed

The evaluation included interviews with six key constituencies described below.

Interviews with Representatives of the Statewide Advisory Committee were conducted with members of the Amnesty Education Program's Statewide Advisory Committee. Since the committee included representation from the three types of service providers — adult schools, CBOs, and community colleges — the evaluators expected to obtain a fairly comprehensive overview of the program during this part of the evaluation and began with no preconceptions concerning the benefits or ultimate value of the Amnesty Education Program. Interviews were conducted in an "open-ended" style without a formal script, and continued as long as the respondents desired[37]. In effect, the value of these interviews was two-fold: they provided baseline perspectives from each type of provider that were used as stimuli during subsequent interviews; and because interviews were conducted face-to-face under a promise of confidentiality, they elicited highly specific and candid discussions. Most interview sessions with Statewide Advisory Committee members lasted one to two hours.

Interviews with Health and Human Service Representatives were designed to compare service providers' perspectives with the perspectives of federal representatives, with special emphasis on the distinction between federal and state responsibilities. These interviews, too, were open-ended.

Interviews with State Agencies. These interviews included state agency administrators who provided oversight for the Amnesty Education Program. These state agencies included the California Department of Education (CDE), California Health and Welfare Agency (HWA), and the California Department of Finance (CDF).

For these interviews, two general questions were scripted to explore the administrative impact and outcomes of the Amnesty Education Program:

1) What differences were there between adult schools, CBOs and community colleges in kinds of students served (e.g. needs,

[37] One interesting aspect about this phase of interviews was that, although meant to isolate both positive and negative issues, it provided more information on problems than on positive outcomes of the program. The later phases of the evaluation were scripted to force greater balance in the interviews, with more initial and follow-up questions on the program's positive aspects.

attitudes), in ways students were served (e.g. types of services provided, barriers to participation), or in education outcomes; and

2) What recommendations could providers share as a result of their experiences in the program (e.g. with respect to program management, education standards and content, support services, relations with state agencies, relations with other service providers)?

During interviews with Department of Education administrators, a third question asked: "What effect did the administrative structure of the program have on 1) the delivery of local program services; 2) the potential for future relations between state administrative agencies; and 3) the creation of a vision for future delivery of immigrant education services in California?"

In addition to these three scripted questions, interviewees were given opportunities to lead the discussion according to their own concerns and interests. As a result, interviews yielded information on problems as well as positive outcomes and potentials. As before, interview sessions with each agency lasted from one to two hours, and included both past and present administrators of the program.

Interviews with Service Administrators, Instructors, and Students were conducted with Amnesty Education Program administrators, instructors and graduated students at 23 service provider sites. Sites were located in both northern and southern California and included large, medium and small provider organizations. Sites interviewed included all three types of providers, adult schools, CBOs and community colleges. The interviews explored in detail these service-related issues:

- Coordination of immigrant services in local areas;
- Strategies for providing immigrants with access to education services;
- General cost and time considerations in providing education services and meeting students' needs;
- Bilingual and English as a Second Language (ESL) instructional methodologies used;
- Methods for assessing students' performance (speaking, writing, reading, other skills);

- Instructor selection and preparation; and
- Students' perceptions of their education needs and the quality of services received.

Scheduled interviews typically involved talking with from one to two administrators, one to three instructors, and two to four students per site. Typically, students were interviewed separately from administrators or instructors. On average, interviews required from a half day to an entire day to complete.

Interviews with County Public Health Departments were two-fold in purpose. First, since the bulk of SLIAG resources coming to California was devoted to reinforcing local counties' public health delivery systems, it was necessary to gain a view of the relationship between the health and education components from the perspective of local public health department officials. Second, since the evaluation was meant to inform future immigrant-related policies, it was important to explore *both* past barriers to and future prospects for local coordination of education and health services. Given the recent history of SLIAG funding and the magnitude of immigrant needs in California, it is expected that competitive friction will continue between the health and education systems over the distribution of future funding for services to immigrants. Consequently, this component of the evaluation sought to explore ways that the two systems could assist each other in meeting the total service needs of immigrant populations. The orientation of these interviews was primarily — but not exclusively — historical. The evaluators solicited public health representatives' experiences with the SLIAG program and their perspectives on providing services to new immigrant populations within their counties. Special effort was made to solicit their visions for optimum service systems, including coordination of education, health, social and other services they believed essential to the well-being of new immigrants.

Public health departments interviewed for this part of the evaluation included those in:

- Los Angeles County (with the largest concentration of new immigrants in the state, and the entire country);
- Sacramento County (an urban-rural county with an established Latino and Asian-American population, and large and growing Southeast Asian-American and Soviet immigrant populations);

- San Diego County (the primary transfer and initial residency point for new Latino immigrants within California);
- San Francisco County (an urban county with established Latino and Asian-American populations, and with fast-growing Central American and Asian immigrant populations);
- Santa Clara County (a fast-growing, increasingly urban county with established Latino and Asian populations and fast-growing new immigrant populations);
- Sonoma County (a Northern California, mostly rural, inland county with a significant Latino farm labor population working in the wine grape and fruit industries); and
- Ventura County (a Southern California rural, coastal county with a large immigrant farm labor work force).

Legislative Search and Interviews were conducted to gather all current legislation with respect to K-12 and adult immigrant education, examine the intent of the legislation and its effects on present and future immigrants, and clarify what are perceived to be the key immigration reform issues.

The legislative information collected comprised assembly bills, senate bills and resolutions from the California Legislature's 1993-1994 regular session. This information search was with the LEGITECH database, and by direct access to legislative committee members and consultants. Fifteen pieces of legislation were found appropriate to this evaluation, and interviews were conducted with representative staff from each legislative office. The interviews varied between one to two hours.

Review of Amnesty Education Programs in Other States was done in telephone interviews with Florida, Illinois, New York and Texas, four states recognized as having significant SLIAG populations. Interviews with these states had multiple purposes. First, they were intended to provide empirical evidence of other states' approaches to conducting administration, service delivery, quality control, curriculum development and other components. The interviews yielded options to California's way of serving amnesty populations' education needs. Second, the interviews documented the possibilities allowable within the SLIAG legislation, especially since California constituencies often cited federal strictures as a primary limitation on the program's effectiveness. Third, the interviews were

opportunities to compare the most prominent features of California's SLIAG experience with those of other states, especially with regard to program administration and implementation, e.g. the way California identified and contracted with education providers. Fourth, in each state, interviews solicited judgments about the Amnesty Education Program's success, along with reasons for whatever levels of success were achieved. All those interviewed were eager to offer such judgments.

Each interview was scheduled in advance, and included at minimum the state's amnesty education coordinator. The conversations varied between one and two hours, and were marked by candor and responsiveness.

Appendix B: Immigration Reform and Control Act Statewide Advisory Committee

Adult Schools

Fe Wood
Centinela Adult School, Lawndale

Domingo Rodriguez
Dale McIntire
Los Angeles Unified School District

Dave Cowles
Merced Adult School, Merced

Walter Popkin
Viet Le
Montebello Adult School, Montebello

Noreen Hanna
Napa Valley Adult School, Napa

Mike Hernandez
Oxnard Adult School, Oxnard

Jerry Rindone
Sweetwater Adult School, Chula Vista

Community-Based Organizations (CBOs)

Raoul Aroz
Catholic Charities of Los Angeles

Raul Meyreles
La Cooperativa, Sacramento

La Muestra Center, Inc., San Diego

Bert Corona
Legal Center of La Hermandad, North Hollywood

Rev. Patricio Guillen
Libreria Del Pueblo, San Bernardino

Juan Jose Gutierrez
One-Stop Immigration/ Education Center, Los Angeles

Community Colleges

Eloise Cantrell
Los Angeles Mission College, Sylmar

Gretchen Bitterlin
San Diego Community College District, San Diego

Denise Quinn
San Francisco City College, San Francisco

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